Exhibit A

Exhibit A

I am an attorney in good standing licensed to practice in all courts in the States

I am a shareholder with the firm of ERICKSON, THORPE &

1 of Nevada and California, and since 2003, I have been a member in good standing of the 2 Nevada bar. 3 SWAINSTON, LTD., and have been actively representing clients in litigation since my 4 admission to the Nevada Bar in September 2003. As a major segment of my litigation 5 practice, I have defended all types of civil rights and governmental tort liability claims 6 involving public entities, officials and employees, in Nevada's State and Federal Courts, 7 throughout my entire career. In so doing, I have a long-standing relationship with the 8 Nevada Public Agency Insurance Pool, which at the time of these events served as insurer 9 for Elko and Storey Counties, its officers and employees. Similarly, I have represented 10

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2. I was retained to represent the Defendants Nye County, Elko County and Storey County in February of 2024 after learning of the instant case. Time spent on this matter has been separately tracked and billed as to each of the represented Defendants, which has required significant administrative effort from the firm and unbilled time on my part. I have represented Nye and Elko Counties for many years, and Storey County as well throughout my career. I consider each of them (and the Pool) to be valued clients.

Nye County, a former Pool member which is currently self-insured, my entire career.

3. Representation of these clients was undertaken with the agreement that shared tasks would be split equally among the three clients, while any work solely for a single client would be billed to that client only. work taken on behalf of Storey and Elko Counties on this specific case was undertaken after retention by the Pool at their current hourly fee of \$225.00 for attorneys, reduced to \$112.50 for travel time. The work on behalf of Nye County, which had recently left the Pool at the time of this litigation, was undertaken via direct retention by Nye County at an hourly rate of \$200.00, reduced to \$100.00 for travel time, under a previous agreement with Nye County. These rates are undeniably reasonable in light of our firm's vast, collective experience and wealth of knowledge regarding the complicated factual and legal issues involved in the defense of claims involving public entities and officials.

/// 

I have reviewed the records of this office and determined that the above-named 4. Defendants incurred a combined total fees to date of \$90,932.50 in seeking and conducting their successful defense in this case. Fees incurred by each of the Defendants are set out below. True, accurate and correct copies of our firm's legal invoices are attached hereto at "Exhibit A." The invoices have been redacted in order to maintain attorney-client privilege and work-product protection, but are otherwise precisely the same invoices sent for payment by our firm. The fees from each invoice are listed in the following chart:

| Statement Date     | Amount      | Total       |
|--------------------|-------------|-------------|
| ELKO COUNTY        |             | \$29,193.75 |
| April 30, 2024     | \$14,962.50 |             |
| July 31, 2024      | \$6,502.50  |             |
| September 29, 2024 | \$3,465.00  |             |
| December 7, 2024   | \$3,971.25  |             |
| January 31, 2025   | \$292.50    |             |
| STOREY COUNTY      |             | \$34,548.75 |
| April 30, 2024     | \$16,762.50 |             |
| July 31, 2024      | \$6,705.00  |             |
| September 29, 2024 | \$4,635.00  |             |
| December 7, 2024   | \$6,153.75  |             |
| January 31, 2025   | \$292.50    |             |
| NYE COUNTY         |             | \$27,190.00 |
| April 30, 2024     | \$13,860.00 |             |
| July 31, 2024      | \$5,860.00  |             |
| September 29, 2024 | \$3,380.00  |             |
| December 7, 2024   | \$3,690.00  |             |
| January 31, 2025   | \$400.00    |             |
|                    | TOTAL       | \$90,932.50 |

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ERICKSON, THORPE& SWAINSTON, LTD.

- The statements in the County Defendants' contemporaneously-filed Motion for 5. Attorney's Fees, to which this Declaration is attached, are true and correct to the best of my knowledge, information and belief. Additionally, I have taken care to ensure this Declaration conforms with the requirements of LR 54-14 pertaining to Motions for Attorney's Fees under the District Court's Local Rules.
- 6. Defendants also necessarily incurred total costs of \$532.19 for travel expenses in defense of this matter, which included attending a hearing on a pseudonym matter ongoing in the Williams case, which was split equally among the clients here.
- The time and labor involved in defense of this specific matter are reflected in 7. the redacted billing statement. Although the underlying facts were straightforward and duplicative of Plaintiff's claims in prior cases, the matter was hotly contested and engendered substantial briefing from Plaintiff's counsel in response to the County Defendants' various attempts to seek dismissal.
- The attached billing statement was reviewed by undersigned counsel and 8. edited, and I can attest that the fees and costs charged are reasonable in my opinion. The fees incurred by Defendants in this matter were reasonable and necessary in defending against the claims asserted by this Plaintiff and her sophisticated counsel.

I hereby certify the factual assertions therein are true and accurate to the best of my knowledge. Furthermore, in accordance with NRS 53.045, I, BRENT L. RYMAN, declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

FURTHER DECLARANT SAYETH NAUGHT.

DATED this 25 day of February, 2025.

BRENT L. RYMAN

Breit



MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

### **INVOICE 04-30-24-BLR**

Nye County (Self Insured) Lorina Dellinger, Acting County Manager Nye County 2100 E. Walt Williams Drive Ste. 100 Pahrump, NV 89048

Statement Date: Statement No.

04/30/2024 973454

Account No.

603709.0

Doe v. Nye County Insured: Nye County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

### **FEES**

| 02/15/2024 | BLR  | Detailed telephone conference with Courtney Sweet, attorney for   | RATE   | HOURS  |        |
|------------|------|---|--------|--------|--------|
| Ţ          | 22.1 | defendant brothel and owner, re:                                  | 200.00 | 0.10   | 20.00  |
|            | BLR  | Receipt, review and detailed analysis of lengthy complaint and    |        |        |        |
|            |      |   | 200.00 | 0.50   | 100.00 |
|            | BLR  | Receipt, review and analysis of notice of judicial assignment and |        |        |        |
|            |      |   | 200.00 | 0.20   | 40.00  |
|            | BLR  | Receipt, review and analysis of filed summonses,                  | 200.00 | 0.10   | 20.00  |
|            | BLR  | Detailed email conferences with County Manager re:                | 200.00 | 0.20   | 40.00  |
| 02/16/2024 | РМВ  | Conduct minor supplemental research on                            |        |        |        |
|            |      |   |        |        |        |
|            |      |   |        |        |        |
|            |      |   |        | Page 1 |        |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 7 of 131 Page: 2 Nye County (Self Insured) April 30, 2024 Statement No: 973454 Doe v. Nye County Insured: Nye County RATE **HOURS** 200.00 80.00 0.40 Begin preparation of Motion to Dismiss 200.00 1.10 220.00 02/19/2024 **PMB** Continue drafting 200.00 0.60 120.00 PMB Continue supplemental research: 200.00 0.10 20.00 02/20/2024 Continue preparation of PMB 200.00 1.50 300.00 BLR Preparation of email report to client representatives and claims representative re: 200.00 0.30 60.00 02/21/2024 PMB Continue preparation of 200.00 0.30 60.00 02/22/2024 Continue preparation of 200.00 0.90 180.00 Work in preparation of motion to dismiss BLR 200.00 0.80 160.00 02/23/2024 BLR Detailed work in preparation of motion to dismiss 200.00 1.20 240.00 PMB Conduct some minor supplemental research 200.00 0.40 80.00 PMB Work in 200.00 0.80 160.00 02/24/2024 BLR Preparation of detailed email to clients re:

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 8 of 131 Nye County (Self Insured)

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Statement No:

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|            |      | ·   |                |               |        |
|------------|------|---|----------------|---------------|--------|
|            |      |   | RATE<br>200.00 | HOURS<br>0.30 | 60.00  |
|            | BLR  | Detailed work in preparation of motion to dismiss for lack of subject matter jurisdiction   | 200.00         | 2.10          | 420.00 |
| 00/00/0004 | DI D | Mariana amail and farance among disease an  | 200.00         | 2.10          | 420.00 |
| 02/26/2024 | BLR  | Various email conferences among clients re:   | 200.00         | 0.10          | 20.00  |
| 02/27/2024 | PMB  | Begin research on   |                |               |        |
|            |      |   | 200.00         | 1.00          | 200.00 |
| 02/28/2024 | PMB  | continue with research  |                |               |        |
| *          |      |   |                |               |        |
|            |      |   | 200.00         | 1.00          | 200.00 |
|            | PMB  | Also examine  |                |               |        |
|            |      |   |                |               |        |
|            |      |   | 200.00         | 1.00          | 200.00 |
| 02/29/2024 | PMB  | Continue research on  | 200.00         | 0.30          | 60.00  |
|            | PMB  | Review and analysis of Motion to Dismiss for Violation of FRCP 8(a), or in the Alternative, Motion to Strike for Violation of FRCP 12(f), filed                 |                | £             |        |
|            |      | by counsel for Mustang Ranch and Gilman   | 200.00         | 0.10          | 20.00  |
|            | PMB  | Begin preparation of Motion to Deny Pro Hac Vice Admission to Practice to All National Center on Sexual Exploitation Attorneys Listed on Complaint (ECF No. 1), | 200.00         | 2.00          | 400.00 |
|            | DI D | Descript review and enghance of Courtle detailed and records  | 200.00         | 2.00          | 400.00 |
|            | BLR  | Receipt, review and analysis of Court's detailed order re: case management conference and joint case management statement,                                      | 200.00         | 0.10          | 20.00  |
|            | BLR  | Receipt, review and analysis of Magistrate Judge Baldwin standing order,  | 200.00         | 0.10          | 20.00  |
|            | BLR  | Receipt, review and analysis of Mustang Ranch Defendants joinder  |                |               |        |
|            |      |   |                |               |        |

| Nye C      |           | 3:24-cv-00065-MMD-CSD<br>Self Insured)                               | Document 160-1            | Filed 02/28/25 | Page 9    | of 131        | Page: 4<br>April 30, 2024 |
|------------|-----------|--|---------------------------|----------------|-----------|---------------|---------------------------|
| Doe v      | . Nye Co  | ounty  |                           |                | Statement | t No:         | 973454                    |
|            | ed: Nye ( |  |                           |                |           |               |                           |
|            |           | to motion to dismiss   |                           |                | 200.00    | HOURS<br>0.10 |                           |
|            | BLR       | Receipt, review and analysis of N required disclosure/certificate of |                           | ant's          | 200.00    | 0.10          | 20.00                     |
|            | BLR       | Receipt, review and analysis of to Dismiss,                          | Mustang Ranch Defenda     | ants' Motion   | 200.00    | 0.30          | 60.00                     |
| 03/01/2024 | PMB       | Continue preparation of Motion to                                    | to Deny Pro Hac Vice A    | dmission,      |           |               |                           |
|            |           |  |                           |                |           |               |                           |
|            |           |  |                           |                |           |               |                           |
|            |           |  |                           |                |           |               |                           |
|            |           |  |                           |                | 200.00    | 2.10          | 420.00                    |
|            | BLR       | Preparation of motion to deny pro                                    | o hac vice admission,     |                |           | 4.00          | 242.00                    |
|            | BLR       | Preparation of certificate of interes                                | rested parties as require | d by rules     | 200.00    | 1.20<br>0.10  |                           |
|            | BLR       | Preparation of email report to clie                                  |                           |                |           |               |                           |
| 10004      | ~: 4D     |  |                           |                | 200.00    | 0.20          | 40.00                     |
| 03/04/2024 | PMB       | Begin initial preparation for Motio                                  | on to Dismiss complaint   |                | 8         |               |                           |
|            |           |  |                           |                |           |               |                           |
|            |           |  |                           |                | 200.00    | 0.40          | 80.00                     |
| 03/05/2024 | РМВ       | Continue with review and analysis                                    | is of                     |                |           |               |                           |
|            |           |  |                           |                |           |               |                           |
|            |           |  |                           |                | 200.00    | 0.40          | 80.00                     |
| 03/07/2024 | РМВ       | Continue   |                           |                |           |               |                           |
|            |           |  |                           |                | 200.00    | 0.30          | 60.00                     |
| 1          |           |  |                           | (4             |           |               | ļ                         |

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| 03/11/2024 | PMB  | Continue review and analysis of  | RATE   | HOURS |        |
|------------|------|--|--------|-------|--------|
|            |      |  | 200.00 | 0.50  | 100.00 |
|            | PMB  | Begin conducting research to   | 200.00 | 0.30  | 60.00  |
|            | BLR  | Receipt, review and preliminary analysis of Plaintiff's opposition to motion to dismiss  | 200.00 | 0.40  | 80.00  |
| 03/12/2024 | РМВ  | Review and analysis of Opposition to Nye County, Elko County and Storey County's (including Leonard "Lance" Gilman in his Official Capacity) Motion to Dismiss for Improper Use of Pseudonym Resulting in Lack of Subject Matter Jurisdiction, | 200.00 | 0.20  | 40.00  |
|            | PMB  | Begin research   |        | 0.20  |        |
|            |      |  | 200.00 | 1.70  | 340.00 |
| 03/13/2024 | PMB  | Research to  |        |       |        |
|            |      |  |        |       |        |
|            |      |  | 200.00 | 1.60  | 320.00 |
|            | PMB  | Conduct research online to   |        |       |        |
| 00/44/0004 | D14D | December of December 1   | 200.00 | 0.30  | 60.00  |
| 03/14/2024 | PMB  | Preparation of Reply   | 202.00 | 2.00  | 400.00 |
|            | BLR  | Receipt, review and analysis of Plaintiff's detailed opposition to motion to dismiss filed by Brothel  | 200.00 | 2.00  | 400.00 |
|            |      | Defendants,  | 200.00 | 0.40  | 80.00  |
| 03/15/2024 | PMB  | Complete writing first draft of reply,   |        |       |        |
|            |      |  |        |       |        |

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Statement No:

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 200.00 | 1.50  | 300.00 |
|            | BLR | Receipt, review and preliminary analysis of opposition to motion to deny pro hac vice applications filed by Plaintiff's counsel,                  | 200.00 | 0.50  | 100.00 |
| 03/18/2024 | DMB | Conduct minor research  | 200.00 | 0.50  | 100.00 |
| U3/10/2024 | PMB | Conduct minor research  | 200.00 | 0.10  | 20.00  |
|            | РМВ | Review  | 200.00 | 0.10  | 20.00  |
|            | PMB | Review and revise   | 200.00 | 0.50  | 100.00 |
|            | PMB | After Attorney Ryman  |        |       |        |
|            |     |   | 200.00 | 0.20  | 40.00  |
|            | PMB | Review and analysis of Opposition to Motion to Deny Pro Hac Vice Admission,   | 200.00 | 0.30  | 60.00  |
|            | PMB | Begin research for  | 200.00 | 0.20  | 40.00  |
|            | BLR | Complete preparation of   |        |       |        |
|            |     |   | 200.00 | 1.50  | 300.00 |
| 03/19/2024 | BLR | Receipt, review and analysis of Mustang Ranch Defendants' Joinder to reply briefing in support of motion to dismiss for improper use of pseudonym | 200.00 | 0.10  | 20.00  |
| 03/20/2024 | PMB | Continue with research on   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 200.00 | 0.50  | 100.00 |
|            | PMB | Also research   |        | 2.00  | 10.00  |
|            |     |   | 200.00 | 0.20  | 40.00  |
|            | PMB | Continue drafting   |        |       |        |
|            |     |   | 200.00 | 2.00  | 400.00 |
|            | PMB | Preparation of  | 4      |       |        |
|            |     |   | _      |       |        |

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Statement No:

|            |     |   | 200.00 | HOURS<br>0.10 | 20.00  |
|------------|-----|---|--------|---------------|--------|
| 03/21/2024 | РМВ | Research  |        |               | 25     |
|            |     |   | 200.00 | 0.80          | 160.00 |
|            | PMB | Conclude drafting   | 200.00 | 0.80          | 160.00 |
|            | PMB | Edit and revise   | 200.00 | 0.40          | 80.00  |
|            | PMB | Review and analysis of Reply in Support of Mustang Ranch's Motion to Dismiss as per Rule 8(a)                             | 200.00 | 0.10          | 20.00  |
|            | BLR | Receipt, review and analysis of Mustang Rang Reply Briefing in response to Rule 8 motion to dismiss/ opposition briefing, | 200.00 | 0.30          | 60.00  |
|            | BLR | Receipt, review and analysis of various returns of summonses for individual and corporate defendants,                     | 200.00 | 0.20          | 40.00  |
| 03/22/2024 | PMB | Assist with   | 200.00 | 0.40          | 80.00  |
|            | BLR | Receipt, review and analysis of   | 200.00 | 0.30          | 60.00  |
|            | BLR | Detailed work in  |        |               |        |
|            |     |   | 200.00 | 1.00          | 200.00 |
|            | BLR | Preparation of email report to clients and claims representative re:  | 200.00 | 0.20          | 40.00  |
| 03/25/2024 | PMB | Dive into research  | 200.00 | 1.30          | 260.00 |
|            |     |   |        |               |        |

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Nye County (Self Insured) Statement No: 973454

Doe v. Nye County Insured: Nye County

RATE **HOURS** Continue with detailed research 03/26/2024 PMB 400.00 2.00 200.00 Begin preparation of 03/27/2024 PMB 1.30 260.00 200.00 PMB Supplemental research on 40.00 0.20 200.00 Conduct supplemental research 03/28/2024 **PMB** 40.00 200.00 0.20 Continue preparation of PMB 60.00 0.30 200.00 Continue preparation of 03/29/2024 PMB

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Nye County (Self Insured)

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Statement No:

|            |            |   | <u>RATE</u> 200.00 | HOURS<br>1.20 | 240.00 |
|------------|------------|---|--------------------|---------------|--------|
| 04/01/2024 | BLR        | Receipt, review and detailed analysis of Motion to Dismiss filed by                                     |                    |               |        |
|            |            | State of Nevada,  | 200.00             | 0.40          | 80.00  |
|            | BLR        | Receipt, review and analysis of initial appearance materials filed by State                             | 200.00             | 0.10          | 20.00  |
| 04/02/2024 | PMB        | Research for  | 200.00             | 0.80          | 160.00 |
|            | РМВ        | Preparation of  | 1                  |               |        |
|            |            |   | 200.00             | 0.90          | 180.00 |
|            | РМВ        | Review and analysis of State Defendants' Motion to Stay Discovery,                                      |                    |               |        |
|            |            | as well as various other minor filings [notices of appearances, etc.] filed over the course of the day  | 200.00             | 0.10          | 20.00  |
|            | BLR        | Receipt, review and analysis of Mustang Ranch Defendants joinder in State Defendants' Motion to Dismiss | 200.00             | 0.10          | 20.00  |
|            | BLR        | Receipt, review and analysis of State Defendants' Motion to Stay Discovery,                             | 200.00             | 0.20          | 40.00  |
|            | BLR        | Receipt, review and analysis of notice of appearance along with   |                    | - 20          | 10.00  |
|            | <b>D</b> L | series of joinders (x5) filed by Desert Rose Defendants   | 200.00             | 0.20          | 40.00  |
| 04/03/2024 | PMB        | Conduct research on   | 200.00             | 0.10          | 20.00  |
|            | PMB        | Preparation of  |                    | - 20          | 12.00  |
|            |            |   | 200.00             | 0.20          | 40.00  |
|            | PMB        | Conduct research to   |                    | 2.40          | 22.00  |
|            |            |   | 200.00             | 0.10          | 20.00  |
|            | PMB        | Conduct research on   |                    | 3.70          | 110.00 |
|            |            |   | 200.00             | 0.70          | 140.00 |
| 04/04/2024 | PMB        | Conduct research on   |                    | 2.20          | 20.00  |
|            |            |   | 200.00             | 0.30          | 60.00  |
|            | PMB        | 3 Continue preparation of   |                    |               |        |
|            |            |   | 200.00             | 4.70          | 240.00 |
|            |            |   | 200.00             | 1.70          | 340.00 |
|            |            |   |                    |               | ,      |

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|            |     |                                       | RATE   | HOURS |        |
|------------|-----|---------------------------------------|--------|-------|--------|
|            | BLR | Review and analysis of                | 200.00 | 0.60  | 120.00 |
| 04/05/2024 | РМВ | Continue preparation of               |        |       |        |
|            |     |                                       | 200.00 | 1.20  | 240.00 |
|            | PMB | Preparation of                        | 200.00 | 0.40  | 80.00  |
|            | PMB | Research                              | Ī      |       |        |
|            | I   |                                       | 200.00 | 0.30  | 60.00  |
|            | РМВ | Preparation of                        | 200.00 | 0.20  | 40.00  |
|            | BLR | Additional research                   | 200.00 | 0.40  | 80.00  |
| 04/07/2024 | РМВ | Preparation of                        | 200.00 | 0.80  | 160.00 |
|            | РМВ | Conduct some supplemental research on | 200.00 | 0.20  | 40.00  |
|            | РМВ | Preparation of                        | 200.00 | 0.50  | 100.00 |
|            | РМВ | Review and revise                     | 200.00 | 1.00  | 200.00 |
|            | PMB | Review and analysis of                |        |       |        |
|            |     |                                       | 200.00 | 1.00  | 200.00 |
| 04/08/2024 | BLR | R Detailed work                       |        |       |        |

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|            |     |  | RATE   | HOURS          |        |
|------------|-----|--|--------|----------------|--------|
|            |     |  | 200.00 | 0.70           | 140.00 |
|            |     | to the state of the Corder of recusal  | 400.00 | 0.000 th 15.00 |        |
|            | BLR | Receipt, review and analysis of Magistrate Judge Order of recusal, reassignment of matter  | 200.00 | 0.10           | 20.00  |
| 04/09/2024 | РМВ | Make several minor revisions to brief,   |        |                |        |
|            |     |  | 200.00 | 0.20           | 40.00  |
|            | РМВ | Continue   |        |                |        |
|            |     |  |        |                |        |
|            |     |  | 200.00 | 0.50           | 100.00 |
|            | BLR | Review and revision of motion to dismiss   |        |                |        |
|            |     |  | 200.00 | 0.30           | 60.00  |
|            | BLR | Receipt, review and analysis of Court's standing order following<br>Magistrate Judge reassignment,                                 | 200.00 | 0.10           | 20.00  |
| 04/10/2024 | BLR | Receipt, review and analysis of separate standing order issued by District Judge Du,   | 200.00 | 0.10           | 20.00  |
|            | BLR | Receipt, review and analysis of joinders filed by Desert Rose<br>Defendants  | 200.00 | 0.10           | 20.00  |
|            | BLR | Email conferences among all counsel re: meet-and-confer, required filing for upcoming case management conference                   | 200.00 | 0.10           | 20.00  |
| 04/11/2024 | PMB |  | 200.00 | 0.40           | 80.00  |
|            | BLR | Ongoing email conferences among all counsel re: upcoming hearing, consideration of responses to Plaintiffs' counsel request, etc., |        |                |        |
|            |     | provide input on stipulation and notes to file re: same  | 200.00 | 0.20           | 40.00  |
|            | BLR | Detailed work in   | 200.00 | 0.50           | 100.00 |
| 04/12/2024 | BLR | Complete   | 200.00 | 0.90           | 180.00 |
|            | BLŔ | Numerous email conferences among all counsel re: proposed stipulation, revisions and approval, etc., arguments re: various points  | 200.00 | 0.20           | 40.00  |
|            | BLR | Receipt, review and analysis of stipulation re: motion to dismiss briefing filed by Plaintiff and State Defendants                 | 200.00 | 0.10           | 20.00  |
|            | BLR | Preparation of email to client representatives re:   | 200.00 | 0.30           | 60.00  |
|            |     |  |        |                | l.     |

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Statement No: 973454

|            |     |  | RATE   | <u>HOURS</u> |        |
|------------|-----|--|--------|--------------|--------|
| 04/15/2024 | PMB | Review and analysis of Def. Chicken Ranch's Motion for a More Definite Statement, and the Proposed Order which accompanied such Motion for the Court's consideration   | 200.00 | 0.10         | 20.00  |
|            | BLR | Receipt, review and analysis of Western Best/Chicken Ranch<br>Defendants' motion for more definite statement, also initial<br>appearance filings including certificate of interested parties, and<br>proposed order for motion | 200.00 | 0.20         | 40.00  |
|            | BLR | Receipt, review and analysis of  | 200.00 | 0.20         | 40.00  |
|            | BLR | Receipt, review and analysis of Court's order on State Defendants' briefing (including Motion to Stay)   | 200.00 | 0.10         | 20.00  |
|            | BLR | Receipt, review and analysis of District Court Order referring consideration of motions to Magistrate Judge  | 200.00 | 0.10         | 20.00  |
| 04/16/2024 | BLR | Receipt, review and analysis of Court's Order granting stipulation re: case management conference statement,   | 200.00 | 0.10         | 20.00  |
| 04/17/2024 | BLR | Receipt, review and analysis of State Defendants' joinder in motion to dismiss for subject matter jurisdiction   | 200.00 | 0.10         | 20.00  |
|            | BLR | Various email conferences among counsel re:  | 200.00 | 0.20         | 40.00  |
|            | BLR | Preparation of email report to clients re:   | 200.00 | 0.20         | 40.00  |
| 04/26/2024 | BLR | Receipt, review and detailed analysis of Plaintiff's opposition to motion to dismiss for lack of subject matter jurisdiction,  | 200.00 | 0.60         | 120.00 |
| 04/28/2024 | РМВ | Review and analysis of Opposition to Nye County, Elko County and Storey County's Motion to Dismiss for Failure of Subject Matter Jurisdiction;   | 200.00 | 0.30         | 60.00  |
|            | PMB | Supplemental research on   | 200.00 | 0.20         | 40.00  |
| 04/29/2024 | BLR | Receipt, review and analysis of stipulation between Plaintiff's and Chicken Ranch Defendants re: response to Complaint, motion to dismiss briefing   | 200.00 | 0.10         | 20.00  |
| 04/30/2024 | BLR | Receipt, review and analysis of Notice of Withdrawal of Motion from Chicken Ranch, in regard to motion for more definite statement,  | 200.00 | 0.10         | 20.00  |
|            | BLR | Receipt, review and analysis of separately-filed notices of summons  |        |              |        |

| Case:<br>Nye County (S          | 3:24-cv-00065-MMD-CSD<br>elf Insured)  | Document 160-1 | Filed 02/            | 28/25                             | Page 18               | of 131                 | Page: 13<br>April 30, 2024 |
|---------------------------------|--|----------------|----------------------|-----------------------------------|-----------------------|------------------------|----------------------------|
|                                 |  |                |                      |                                   | Statement             | No:                    | 973454                     |
| Doe v. Nye Co<br>Insured: Nye ( |  |                |                      |                                   |                       |                        |                            |
|                                 | served for various brothel defen   | dants          |                      |                                   | <u>RATE</u><br>200.00 | HOURS<br>0.10          |                            |
| BLR                             | Receipt, review and analysis of<br>for leave to proceed anonymous                          |                | o file motion        |                                   | 200.00                | 0.10                   | 20.00                      |
| BLR                             | Email conferences with Plaintiff service, response to same, For Current Services Rendered: |                | or waiver of         |                                   | 200.00                | 0.20<br>69.30          |                            |
| Bre                             | nekeeper<br>ent L. Ryman<br>ul M. Bertone  | 2              | ours<br>1.10<br>8.20 | <u>Rate</u><br>\$200.00<br>200.00 | \$4,22                | OTAL<br>20.00<br>40.00 |                            |
|                                 | Total Current Work   |                |                      |                                   |                       |                        | 13,860.00                  |

**Balance Due** 

Please Remit

\$13,860.00

\$13,860.00

# ERICKSON, THORPE& SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### **INVOICE 07-31-24-BLR**

Nye County (Self Insured) Lorina Dellinger, Acting County Manager Nye County 2100 E. Walt Williams Drive Ste. 100 Pahrump, NV 89048

07/31/2024 Statement Date: Statement No. 974183 Account No. 603709.0

Doe v. Nye County Insured: Nye County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

## FEES

|            |     |   | RATE   | <u>HOURS</u> |        |
|------------|-----|---|--------|--------------|--------|
| 05/01/2024 | PMB | Research or   |        |              |        |
|            |     |   |        |              |        |
| 4          |     |   |        |              |        |
|            |     |   |        |              |        |
|            |     |   | 200.00 | 1.30         | 260.00 |
|            | РМВ | Preparation of Reply in Support of Motion to Dismiss  |        |              |        |
|            |     |   | 200.00 | 1.30         | 260.00 |
|            | BLR | Email conferences with Plaintiff's counsel re: acceptance of service demand for same  | 200.00 | 0.10         | 20.00  |
|            | BLR | Review and consideration of request for waiver of service for Elko County prepared by Plaintiff's counsel, email re: agreement for same | 200.00 | 0.20         | 40.00  |
| 05/02/2024 | PMB | Continue preparation of Reply in Support of Motion to Dismiss,  | 200.00 | 1.00         | 200.00 |
|            | РМВ | Preparation of  |        | Dago         | 1      |

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Nye County (Self Insured)

|            |     |  | RATE   | HOURS |        |
|------------|-----|--|--------|-------|--------|
|            |     |  | 200.00 | 1.00  | 200.00 |
|            | BLR | Detailed work in preparation of Reply in Support of Motion to Dismiss for Lack of Subject Matter Jurisdiction,   | 200.00 | 0.70  | 140.00 |
| 05/06/2024 | BLR | Receipt, review and analysis of waiver of service of materials filed by Plaintiffs in regard to Mustang Ranch Defendants,  | 200.00 | 0.10  | 20.00  |
|            | BLR | Receipt, review and analysis of email correspondence from Plaintiffs' counsel re: request to stay discovery pending motion briefing, consideration of same and response, participate in numerous communications among all counsel re: same | 200.00 | 0.20  | 40.00  |
|            | PMB |  | 200.00 | 0.20  | 40.00  |
| 05/07/2024 | BLR | Ongoing email conferences among all counsel re: stipulation to continue discovery, compliance with Court's direction to meet and confer  | 200.00 | 0.10  | 20.00  |
|            | BLR | Receipt, review and analysis of draft stipulation to continue discovery prepared by Plaintiff's counsel, email conferences re: revisions and approval of same  | 200.00 | 0.10  | 20.00  |
| 05/08/2024 | BLR | Continuing email conferences among all counsel re: stipulation to stay discovery, order to meet and confer, etc.,  | 200.00 | 0.10  | 20.00  |
| 05/09/2024 | BLR | Continuing email conferences among all counsel re: motion to stay, stipulation for same and meet and confer request  | 200.00 | 0.10  | 20.00  |
| 05/10/2024 | BLR | Email conferences among all counsel re: meet and confer and<br>upcoming case management conference   | 200.00 | 0.10  | 20.00  |
| 05/13/2024 | BLR | conference statement, meet-and-confer, etc., review and revision of draft joint case management conference statement prepared by Plaintiff's counsel, preparation of detailed email to all counsel re:                                     | 200.00 | 0.20  | 60.00  |
|            | BLR | demanded revisions, etc.  Receipt, review and analysis of filed notice of forthcoming status report prepared and filed by Plaintiff's counsel  | 200.00 | 0.30  | 20.00  |
|            | BLR |  | 200.00 | 0.10  | 20.00  |
|            | BLR | Email conferences among all counsel re: stipulation for stay of discovery and upcoming case management conference  | 200.00 | 0.10  | 20.00  |
| 05/16/2024 | BLR | Various, ongoing email conferences among all counsel re: joint case conference report, review and revision of new draft,   | 200.00 | 0.20  | 40.00  |

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Nye County (Self Insured)

Page: 3 July 31, 2024

974183

Statement No:

|            |     | 5  | RATE   | HOURS |        |
|------------|-----|--|--------|-------|--------|
| 05/17/2024 | BLR | Numerous, ongoing email conferences among all counsel re: case management conference statement and revisions, approval of same   | 200.00 | 0.20  | 40.00  |
|            | BLR | Receipt, review and analysis of filed case management conference statement, ensure compliance with approval and  | 200.00 | 0.10  | 20.00  |
|            | BLR | Receipt, review and analysis of Chicken Ranch Defendants' joinder to motion to dismiss for improper use of pseudonym   | 200.00 | 0.10  | 20.00  |
| 05/19/2024 | BLR | Receipt, review and analysis of email communications from counsel for Chicken Ranch re:  | 200.00 | 0.20  | 40.00  |
|            | BLR | Review and analysis of   | 200.00 | 0.30  | 60.00  |
| 05/21/2024 | BLR | Receipt, review and analysis of email from third party re: purported intent to intervene, allegations against brothel Defendant and Plaintiff, research re:                | 200.00 | 0.30  | 60.00  |
| 05/24/2024 | BLR | Receipt, review and analysis of stipulation and order re: Plaintiff's response to State Defendants' motion to dismiss  | 200.00 | 0.10  | 20.00  |
|            | BLR | Conduct internet research re:  | 200.00 | 0.20  | 40.00  |
| 05/28/2024 | BLR | Receipt, review and analysis of Court's order on stipulation related to State briefing   | 200.00 | 0.10  | 20.00  |
| 05/30/2024 | PMB | Review and analysis of correspondence from Plaintiff seeking to satisfy "meet and confer" requirements concerning a Motion for Protective Order over Pseudonym in Caption  | 200.00 | 0.10  | 20.00  |
|            | PMB | Begin reviewing  | 200.00 | 0.10  | 20.00  |
|            | PMB | Preparation of correspondence to Plaintiff's counsel objecting to filing   | I      |       |        |
|            |     |  | 200.00 | 0.20  | 40.00  |
|            | BLR | Receipt, review and analysis of email correspondence from Plaintiff's counsel re: "meet and confer" for motion for protective order, review draft order and preparation of |        |       |        |
|            |     |  | 200.00 | 0.50  | 100.00 |
| 05/31/2024 | PMB | Review and analysis of Motion for Protective Order and Leave to<br>Proceed Pseudonymously,   | 200.00 | 0.20  | 40.00  |
|            | PMB | Review and analysis of Exhibits to said Motion, including article  |        |       |        |
|            |     |  |        |       | ,      |

Page: 4 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 22 of 131 July 31, 2024 Nye County (Self Insured) 974183 Statement No: Doe v. Nye County Insured: Nye County HOURS RATE entitled "Human Trafficking eLearning.com, Understanding the 60.00 0.30 Stages of Recovering from Sex Trafficking" 200.00 Review and analysis of [Proposed] Order Granting Motion for PMB 40.00 Protective Order and Leave to Proceed Pseudonymously 200.00 0.20 PMB Review and analysis of 40.00 0.20 200.00 Begin research PMB 80.00 0.40 200.00 PMB Research 60.00 0.30 200.00 Receipt, review and analysis of Plaintiff's detailed motion for protective order/motion to proceed pseudonymously, 120.00 0.60 200.00 Various email and telephone conferences among defense counsel 40.00 0.20 200.00 Receipt, review and analysis of State of Nevada Defendants' reply in BLR 60.00 0.30 200.00 support of motion to dismiss, PMB Brief supplemental research or 06/04/2024 20.00 200.00 0.10 Continue preparation of Opposition to Motion for Protective Order **PMB** and for Leave to Proceed Pseudonymously, 340.0 1.70 200.00 Major editing and revision of said Opposition to Motion for Protective PMB 06/06/2024 Order, also

240.0

1.20

200.00

06/07/2024 PMB Conduct some supplemental research on

974183

Nye County (Self Insured)

Statement No:

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            | PMB | After Atty Ryman's revisions  | 200.00 | 0.20  | 40.00  |
|            | , , |   | 200.00 | 0.20  | 40.00  |
|            | BLR | Work in preparation of opposition to Plaintiff's motion for protective order and leave to proceed anonymously.  | 200.00 | 0.50  | 100.00 |
| 06/10/2024 | BLR | Receipt, review and analysis of Mustang Ranch Defendants' Joinder   | 200.00 | 0.10  | 20.00  |
| 06/11/2024 | PMB | Preparation of brief correspondence to Attorney Ryman re  | 200.00 | 0.10  | 20.00  |
| 06/12/2024 | BLR | Receipt, review and analysis of   | 200.00 | 0.20  | 40.00  |
|            | BLR | Receipt, review and analysis of State Defendants' joinder in response   | 200.00 | 0.10  | 20.00  |
| 06/13/2024 | PMB | Review and analysis of State Defendants' Joinder in County<br>Defendant's Opposition to Motion for Protective Order                                     | 200.00 | 0.10  | 20.00  |
|            | PMB | Review and analysis of Defendant Desert Rose Club's Joinder in Counties' Opposition to Motion for Protective Order                                      | 200.00 | 0.10  | 20.00  |
|            | PMB | Review and analysis of Western Best Defendants' Opposition to<br>Plaintiff's Motion for a Protective Order And Leave to Proceed<br>Pseudonymously       | 200.00 | 0.10  | 20.00  |
|            | PMB | Review and analysis of Declaration of Kenneth R. Green, filed as supportive evidence for Western Best's above Opposition to Motion for Protective Order | 200.00 | 0.10  | 20.00  |
|            | PMB | Review and analysis of Chicken Ranch's Joinder in Counties'<br>Opposition to Motion for Protective Order  | 200.00 | 0.10  | 20.00  |
|            | PMB | Engage in series of email correspondence with counsel for Best Western Defendants re  |        |       |        |
|            |     |   | 200.00 | 0.30  | 60.00  |

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Nye County (Self Insured)

Statement No:

974183

Page: 6 July 31, 2024

|            | BLR | Receipt, review and analysis of detailed opposition to motion for protective order filed by Chicken Ranch/Western Best Defendants,   | RATE   | <u>HOURS</u> |       |
|------------|-----|--|--------|--------------|-------|
|            |     | protective order mod by ormandir national management and a second mod by ormandir national management and a second model model by ormandir national model model and a second model | 200.00 | 0.20         | 40.00 |
|            | BLR | Receipt, review and analysis of Errata filed by Western Best<br>Defendants,  | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of State Defendants' joinder to Western Best briefing   | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's detailed reply in support of motion for protective order (responding to County Defendants' opposition briefing),   |        |              |       |
|            |     |  | 200.00 | 0.30         | 60.00 |
| 06/14/2024 | PMB | Review and analysis of Notice of Errata filed by Best Western Defendants   | 200.00 | 0.10         | 20.00 |
|            | PMB | Preparation of correspondence to Atty Ryman  | 200.00 | 0.10         | 20.00 |
|            | РМВ | Review and analysis of Joinder to Western Best Defendants' Opposition to Plaintiff's Motion for a Protective Order and Leave To Proceed Pseudonymously   | 200.00 | 0.10         | 20.00 |
| 06/17/2024 | PMB | Review and analysis of   | 200.00 | 0.10         | 20.00 |
|            | РМВ | Research to  | 200.00 | 0.20         | 40.00 |
|            | РМВ | Preparation of Motion for Leave of Court to Supplement Motion to Dismiss for Lack of Subject Matter Jurisdiction due to Lack of Standing   | 200.00 | 0.30         | 60.00 |
|            | PMB | Review and analysis of Plaintiff's Reply in Support of Motion for<br>Protective Order  | 200.00 | 0.10         | 20.00 |
|            | PMB | Review and analysis of correspondence from Attv Deanna Forbush, counsel for Chicken Ranch Defendants, re   |        |              |       |

Page: 7 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 25 of 131 July 31, 2024 Nye County (Self Insured) 974183 Statement No: Doe v. Nye County Insured: Nye County HOURS RATE 40.00 0.20 200.00 PMB Preparation of 06/19/2024 60.00 0.30 200.00 Exchange series of email correspond. with Deanna Forbush, counsel

for Chicken Ranch defendants, 20.00 0.10 200.00 Revision and preparation of motion for leave of court to supplement

motion to dismiss, 60.00 0.30 200.00 Review and analysis of series of email communications from

06/20/2024

co-defense counsel Deanna Forbush 0.30 200.00

20.00 0.10 200.00

60.00

PMB Review and analysis of Receipt, review and analysis of Plaintiff's detailed response/reply re: BLR motion for protective order, responding to Western Best Defendants' 40.0 0.20 200.00 arguments Review and analysis of Plaintiff's Reply against Western Best 06/21/2024 PMB Defendants' Opposition to PI's Motion for Protective Order [ECF No. 40.0 0.20 200.00 85]

Nye County (Self Insured)

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Page: 8 July 31, 2024

Statement No: 974183

|            | РМВ   | Telephone conference with Deanna Forbush, counsel for Western  | RATE   | HOURS |        |
|------------|-------|--|--------|-------|--------|
|            | FIVID | Telephone comercines with Bearing 1 orbabn, sounder to 1   | 200.00 | 0.10  | 20.00  |
|            | РМВ   | Review and analysis of   |        |       |        |
|            |       |  | 200.00 | 0.10  | 20.00  |
| 06/24/2024 | РМВ   | Review and analysis of State Defendant's Motion to Take Judicial Notice or in the Alternative Motion for Leave to Supplement Motion to Dismiss (ECF No. 86). |        |       |        |
|            |       |  |        |       |        |
|            |       |  | 200.00 | 0.10  | 20.00  |
|            | PMB   | Conduct very brief research to   | 200.00 | 0.10  | 20.00  |
|            | PMB   | Discuss with Attorney Ryman  | 200.00 |       | 0.00   |
|            | BLR   | Receipt, review and analysis of motion for judicial notice filed by State Defendants   |        |       |        |
|            |       |  | 200.00 | 0.20  | 40.00  |
|            | BLR   | Receipt, review and analysis of email communications   | 200.00 | 0.10  | 20.00  |
| 06/25/2024 | PMB   | Review and analysis of correspondence from co-defense counsel for the Chicken Ranch defendants, re:  |        |       |        |
|            |       |  |        |       |        |
|            | DMD   | Perform a summary review of  | 200.00 | 0.20  | 40.00  |
|            | PMB   | Perform a summary review or  | 200.00 | 0.20  | 40.00  |
|            | РМВ   | Preparation of correspondence to Attorney Ryman  | 200.00 | 0.23  | -,0.00 |
|            |       |  | 200.00 | 0.10  | 20.00  |

Nye County (Self Insured)

Statement No:

974183

| insured.   | Nye C        | Suffy  |        |       |        |
|------------|--------------|--|--------|-------|--------|
|            |              |  | RATE   | HOURS |        |
|            | РМВ          | Review and analysis of correspondence from Attorney Ryman with   | 200.00 | 0.10  | 20.00  |
|            | PMB          | Per instruction from Attorney Ryman,   |        |       |        |
|            |              |  | 200.00 | 0.10  | 20.00  |
|            | PMB          | Review and analysis of Verified Petition for Pro Hac Vice application forms for three separate attorneys of the National Center on Sexual Exploitation (ECF Nos. 87, 88, 89) |        |       |        |
|            |              |  | 200.00 | 0.20  | 40.00  |
|            | РМВ          | Detailed review and analysis of  | 200.00 | 0.10  | 20.00  |
|            | PMB          | Preparation of Opposition to Verified Petitions [ECF No. 90],  |        |       |        |
|            | PIVID        | Preparation of Opposition and addition   | 200.00 | 0.40  | 80.00  |
|            | PMB          | Assist with revision and editing of same Opposition,   |        |       |        |
|            | Cilipine.co. |  | 200.00 | 0.20  | 40.00  |
|            | BLR          | Various email conferences among defense counsel  |        |       |        |
|            |              |  | 200.00 | 0.20  | 40.00  |
|            | BLR          | admission to District of Nevada from various National Center on  | ı      |       |        |
|            |              | Sexual Exploitation attorneys  | 200.00 | 0.30  | 60.00  |
|            | BLR          | Detailed work in preparation of  |        |       |        |
|            |              |  | 200.00 | 0.70  | 140.00 |
| 06/26/2024 | PMB          | Review and analysis of State defendants' (Governor and Atty<br>General) Joinder in County Defendants Opposition To Pro Hac Vice<br>Petitions                                 | 200.00 | 0.10  | 20.0   |
|            | PMB          | Review and analysis of Chicken Ranch Defendants Opposition to Plaintiff's Attorneys' Motion to Practice Pro Hac Vice (ECF No. 92), as well as                                |        |       |        |

was filed twice by clerk,

974183

Nye County (Self Insured)

Statement No:

|            | •   |   |                       |               |       |
|------------|-----|---|-----------------------|---------------|-------|
|            |     |   | <u>RATE</u><br>200.00 | HOURS<br>0.20 | 40.00 |
|            | РМВ | Conduct supplemental research to  |                       |               |       |
|            |     |   |                       |               |       |
|            |     |   | 200.00                | 0.20          | 40.00 |
|            |     | 15 Objeton Ronch  | 200.00                | 0.20          | 40.00 |
|            | PMB | Preparation of correspondence to counsel for Chicken Ranch<br>Defendants (Atty Deanna Forbush)  |                       |               |       |
|            |     |   | 200.00                |               | 0.00  |
|            | BLR | Receipt, review and analysis of State of Nevada Defendants' joinder to response to motions for pro hac vice admission                                     | 200.00                | 0.10          | 20.00 |
|            | BLR | Receipt, review and analysis of opposition to motions for pro hac vice admission filed by Western Best Defendants, including                              |                       |               |       |
|            |     |   | 200.00                | 0.30          | 60.00 |
| 06/28/2024 | BLR | Receipt, review and analysis of Mustang Rang Defendants' joinder to opposition to motion for pro hac vice admission                                       | 200.00                | 0.10          | 20.00 |
| 07/02/2024 | PMB | Review and analysis of Motion to Amend, reflecting changes to Petition for Pro Hac Vice admission for Plaintiff's counsel Christen Price (ECF No. 94) and | 200.00                | 0.10          | 20.00 |
|            | PMB | Review and analysis of Motion to Amend, reflecting changes to Petition for Pro Hac Vice admission for Plaintiff's counsel Peter Gentala (ECF No. 95) and  | 200.00                | 0.10          | 20.00 |
|            | РМВ | Exchange several email corresp. with counsel for Chicken Ranch defendants, Deanna Forbush, re   | 200.00                | 0.10          | 20.00 |
|            | BLR | Receipt, review and analysis of corrected pro hac vice applications from NCOSE attorneys  | 200.00                | 0.20          | 40.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's combined reply in support of motions to permission for pro hac vice admission,                                | 200.00                | 0.30          | 60.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's combined response to motion for leave of court to supplement (re: USSC cert denial), which                    | I                     |               |       |

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July 31, 2024

Nye County (Self Insured)

Statement No: 974183

Doe v. Nye County
Insured: Nye County

RATE HOURS 0.30 60.00 200.00 Review and analysis of Plaintiff's combined response to State and 07/03/2024 PMB County Defendants' Motion for Leave to Supplement Record (ECF 20.00 0.10 200.00 Nos. 96 & 97) Review and analysis of Plaintiff's Reply in Support of Pro Hac Vice PMB 20.00 0.10 200.00 petitions (ECF No. 98) PMB Conference with Attorney Ryman re 0.00 200.00 Receipt, review and analysis of State Defendants reply in support of 07/09/2024 BLR motion to dismiss, 40.00 0.20 200.00 BLR Work in preparation 60.00 0.30 200.00 Receipt, review and analysis of State Defendants reply in support of motion for judicial notice, 40.00 0.20 200.00 PMB Review and analysis of State Defendants Reply in Support of Motion 07/10/2024 20.00 0.10 200.00 for Judicial Notice (ECF No. 99) Research to **PMB** 60.00 0.30 200.00 PMB Preparation of Reply arguments in Support of County Defendants' Motion for Leave (ECF No.84), edit and revise 100.00 0.50 200.00

|            | BLR | Receipt, review and analysis of notice of docket corrections re: recent filing, review of filing from State Defendants re: same | 200.0 | 0 0.10 | 20.00 |
|------------|-----|---|-------|--------|-------|
| 07/11/2024 | PMB | Review and analysis of Notice of Appearance   | 200.0 | 0 0.10 | 20.00 |
|            | PMR | Preparation of correspondence to Attorney Ryman   |       |        |       |

Case 3:24-cv-00065-MMD-CSD Document 160-1

Filed 02/28/25

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Statement No:

974183

Doe v. Nye County Insured: Nye County

Nye County (Self Insured)

|            |       |   |                                  |                            | RATE   | HOURS                  |                   |
|------------|-------|---|----------------------------------|----------------------------|--------|------------------------|-------------------|
|            |       |   |                                  |                            |        |                        |                   |
|            |       |   |                                  |                            | 200 00 | 0.10                   | 20.00             |
|            | РМВ   | Receive back correspondence from Attorney Ryman   |                                  |                            | 200.00 | 0.10                   | 20.00             |
|            | TIVID | Noon of Business and State of |                                  |                            | 200.00 |                        | 0.00              |
| 07/23/2024 | BLR   | Receipt, review and analysis of notice of change of a<br>Attorney General's office on behalf of state defendar  | address from<br>nts              |                            | 200.00 | 0.10                   | 20.00             |
| 07/25/2024 | BLR   | Receipt, review and analysis of District Court's Order denying motion to deny pro hac vice admission,   | r (minute order                  | r)                         | 200.00 | 0.10                   | 20.00             |
|            | BLR   | Receipt, review and analysis of Court's order denying (since-amended) pro hac vice admissions, review   | g                                |                            |        |                        |                   |
|            |       | pro hac vice petitions (or amended petitions) for NCO<br>Price, Hirsh and Gentala   | orders granting<br>OSE attorneys |                            | 200.00 | 0.20                   | 40.00<br>5,860.00 |
|            |       | For Current Services Rendered:  |                                  |                            |        | 20.00                  | 2,242             |
|            | Bre   | Recapitulation<br>nekeeper<br>ent L. Ryman<br>ul M. Bertone   | <u>Hours</u><br>11.90<br>17.40   | Rate<br>\$200.00<br>200.00 | \$2,3  | OTAL<br>80.00<br>80.00 |                   |

**Total Current Work** 

5,860.00

**Total Previous Billings** 

\$11,380.00

## **Payments**

Payment - Nye County Treasurer (Invoice #973454) 06/05/2024

-13,860.00

**Balance Due** 

\$3,380.00

Please Remit

\$3,380.00

# **ERICKSON, THORPE&** SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

### **INVOICE 09-29-24-BLR**

Statement Date:

09/29/2024 974230

Statement No. Account No.

603709.0

Nye County (Self Insured) Lorina Dellinger, Acting County Manager Nye County 2100 E. Walt Williams Drive Ste. 100 Pahrump, NV 89048

Doe v. Nye County Insured: Nye County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

## **FEES**

| 07/29/2024 | BLR | Receipt, review and analysis of detailed motion to intervene as Defendant filed by A Safer Nevada political action committee.       | RATE   | <u>HOURS</u> |       |
|------------|-----|---|--------|--------------|-------|
|            |     |   | 200.00 | 0.30         | 60.00 |
| 08/07/2024 | BLR | Review and analysis of notices of refiling for motion to intervene and appearances related to Russel Greer's motion to intervene    | 200.00 | 0.10         | 20.00 |
| 08/12/2024 | РМВ | Review and analysis Plaintiff's Opposition to Mr. Greer's Motion to Intervene (ECF No. 111, consisting of 11 pages) and also review |        |              |       |
|            |     |   |        |              |       |
|            |     |   | 200.00 | 0.20         | 40.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's response to motion for intervenor by Russell Greer,                                     | 200.00 | 0.20         | 40.00 |
|            |     |   | 200.00 | 0.20         | 40.00 |
| 08/16/2024 | PMB | Review and analysis of Order of August 16, 2024, dismissing all claims against County Defendants with prejudice                     | 200.00 | 0.30         | 60.00 |
|            |     |   |        |              |       |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25

Nye County (Self Insured)

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131 Page: 2 September 29, 2024

Statement No: 974230

|             |       |  | DATE   | HOURS         |        |
|-------------|-------|--|--------|---------------|--------|
|             | BLR   | Preparation of detailed email to clients re:   | 200.00 | 0.30          | 60.00  |
|             |       | to the first and a granting motion to  | 200.00 | 0.00          | 00.00  |
|             | BLR   | Receipt, review and analysis of detailed order granting motion to<br>dismiss for lack of subject matter jurisdiction, consideration of | 200.00 | 0.30          | 60.00  |
|             |       |  | 200.00 | 0.50          | 00.00  |
|             | BLR   | Research   |        |               |        |
|             |       |  | 200.00 | 0.50          | 100.00 |
| 08/20/2024  | BLR   | Email conferences with Attorney General's office re:   |        |               |        |
|             |       |  | 200.00 | 0.10          | 20.00  |
|             | BLR   | Research   |        |               |        |
|             |       |  | 200.00 | 0.50          | 100.00 |
| 08/21/2024  | BLR   |  | 200.00 | 0.10          | 20.00  |
| 20/00/0004  | מופ   | Receipt, review and analysis of Plaintiff's motion for entry of default  | 200.00 | <u></u>       |        |
| 08/29/2024  | BLR   | against Hacienda Defendant, along with accompanying declaration  | 200.00 | 0.10          | 20.00  |
|             | BLR   | Continue research re:  | 200.00 | 0.70          | 140.00 |
| 00/20/20/24 | DI D  | Receipt, review and analysis of Plaintiff's detailed response to court's   |        | <del></del> . |        |
| 08/30/2024  | BLR   | order to show cause re:  | I      |               |        |
|             |       |  | 200.00 | 0.30          | 60.00  |
| 09/03/2024  | BLR   | Various telephone conferences among counsel re:  |        |               |        |
|             |       |  | 200.00 | 0.20          | 40.00  |
| 09/04/2024  | РМВ   | Research to  | 200.00 | 0.80          | 160.00 |
|             | PMB   | Research for   |        |               |        |
|             | FIVIU | Research for   |        |               |        |
|             |       |  | 200.00 | 0.70          | 140.00 |
|             | PMB   | Review and analysis of   |        |               |        |
|             |       |  |        |               |        |
|             |       |  |        |               |        |
|             |       |  | 200.00 | 0.40          | 80.00  |
|             |       |  |        |               |        |

Page: 3 Page 33 of 131 Fage. 5 September 29, 2024 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Nye County (Self Insured) 974230 Statement No: Doe v. Nye County Insured: Nye County **HOURS** RATE Preparation of detailed email report to all clients re: 60.00 0.30 200.00 Review and analysis of Plaintiff's Response to Court's Order to Show **PMB** 09/05/2024 Cause (ECF No. 112), 20.00 0.10 200.00 PMB Review and analysis of 60.00 200.00 0.30Begin preparation of Motion for Certification and Entry of Final PMB Judgment Pursuant to FRCP 54(b), prepare 300.00 1.50 200.00 Revisit **PMB** 20.00 0.10 200.00 PMB Preparation of 20.00 0.10 200.00 Continue working on Motion for Rule 54(b) certification, draft 09/06/2024 80.00 0.40 200.00 Prepare all arguments for 54(b) certification, PMB 240.00 1.20 200.00 20.0 0.10 200.00 Preparation of PMB Email conferences among counsel re: BLR 20.0 0.10 200.00 Receipt, review and analysis of pro hac vice petition filed by attorney BLR 20.0 200.00 0.10 Benjamin Bull Receipt, review and analysis of pro hac vice petition filed by Danielle BLR 20.0 0.10 200.00 Pinter, Revise and edit entire Motion for Rule 54(b) certification [12 pages], PMB 09/08/2024

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Nye County (Self Insured)

974230

Statement No:

| insured.   | Nye C | ounty   |                       |               |        |
|------------|-------|---|-----------------------|---------------|--------|
|            |       | to final form for   | <u>RATE</u><br>200.00 | HOURS<br>0.80 | 160.00 |
| 09/09/2024 | BLR   | Receipt, review and analysis of District Court's orders granting motions for permission to practice pro hac vice,   | 200.00                | 0.10          | 20.00  |
|            | BLR   | Detailed work in preparation and revision of motion for certification of final judgment pursuant to FRCP Rule 54(b),  | 200.00                | 1.50          | 300.00 |
| 09/10/2024 | PMB   | Review and analysis of Proposed Defendant Intervenor's Request for Judicial Notice  | 200.00                | 0.10          | 20.00  |
|            | PMB   | Review and analysis of  | 200.00                | 0.10          | 20.00  |
|            | PMB   | Preparation of brief email to Attorney Ryman  | 200.00                | 0.10          | 20.00  |
|            | BLR   | Receipt, review and analysis of intervenor Russell Greer's "request for judicial notice" and review   | 200.00                | 0.30          | 60.00  |
|            | BLR   | Preparation of email report to all clients re:  | 200.00                | 0.30          | 60.00  |
| 09/12/2024 | РМВ   | Review and analysis of Clerks Entry of Default against Hacienda Rooming House   | 200.00                | 0.10          | 20.00  |
|            | РМВ   | Review and analysis of Mustang Ranch's Response to Plaintiff's Response to Order To Show Cause [ECF NO. 115] and prepare  |                       |               |        |
|            |       |   | 200.00                | 0.20          | 40.00  |
|            | BLR   | Receipt, review and analysis of Clerk's entry of default against brothel Defendant Hacienda Rooming House   | 200.00                | 0.10          | 20.00  |
|            | BLR   | Receipt, review and analysis of detailed response/opposition to Plaintiff's response to order to show cause, as allowed by Judge Du's Order, from Mustang Defendants, | 200.00                | 0.20          | 40.0   |
| 09/13/2024 | BLR   | Receipt, review and analysis of detailed response to Plaintiff's brief  |                       |               |        |

Nye County (Self Insured)

Statement No:

974230

|            |     |   |        |              | !     |
|------------|-----|---|--------|--------------|-------|
|            |     |   | RATE   | <u>HOURS</u> |       |
|            | l   | re: OSC order filed by Desert Rose Club brothel Defendants,   | 200.00 | 0.20         | 40.00 |
| 09/16/2024 | PMB | Review and analysis of Joinder of State Defendants in County Defendants' Motion for Rule 54(b) Cert. (ECF No. 130)                      | 200.00 | 0.10         | 20.00 |
|            | PMB | Review and analysis of Hacienda Room's Notice of Unavailability and Request for Continuance (ECF No. 129)                               | 200.00 | 0.10         | 20.00 |
|            | PMB | Review and analysis of Hacienda's Joinder in Brothel Defendant's Response to Plaintiff's Response to Order to Show Cause (ECF No. 128)  | 200.00 | 0.10         | 20.00 |
|            | РМВ | Review and analysis of Hacienda's Response to Plaintiff's Response to Order to Show Cause (ECF No. 127)                                 | 200.00 | 0.10         | 20.00 |
|            | РМВ | Review and analysis of Hacienda's Response to Request for Default   |        | - 40         | 22.00 |
|            | ı   | (ECF No. 126)   | 200.00 | 0.10         | 20.00 |
|            | PMB | Hacienda Room (ECF No. 125)   | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of notice of appearance of counsel for<br>Defendant Hacienda Rooming house (defaulted)                     | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of Defendant Hacienda Rooming<br>House response to motion for entry of default judgment,                   |        |              |       |
|            |     |   | 200.00 | 0.20         | 40.00 |
|            | BLR | Receipt, review and analysis of Defendant Hacienda Rooming<br>House response to Order to Show Cause                                     | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of Defendant Hacienda Rooming House joinder in previous filings,   | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of motion to continue deadlines filed by Hacienda Rooming House attorney                                   | 200.00 | 0.10         | 20.00 |
|            | BLR | Receipt, review and analysis of State Defendants' joinder to County<br>Defendants' motion for certification of final judgment           | 200.00 | 0.10         | 20.00 |
| 09/18/2024 | BLR | Email and telephone conferences with  | 200.00 | 0.20         | 40.00 |
|            | BLR | Receipt, review and analysis of notice of hearing in related consideration of relevance of decision,                                    | 200.00 | 0.20         | 40.00 |
| 09/23/2024 | PMB | Review and analysis of Plaintiff's Opposition to County Defendants' Motion for Certification and Entry of Final Judgment (ECF No. 131), |        |              | 1     |
|            |     |   |        |              |       |

974230 Statement No: Doe v. Nye County Insured: Nye County HOURS RATE 20.00 0.10 200.00 Receipt, review and analysis of Plaintiff's opposition to motion for certification of final judgment, 40.00 0.20 200.00 Email conference BLR 60.00 0.30 200.00 3,380.00 16.90 For Current Services Rendered: Recapitulation **TOTAL** Rate Hours Timekeeper \$1,720.00 \$200.00 8.60 Brent L. Ryman 1,660.00 200.00 8.30 Paul M. Bertone 3,380.00 **Total Current Work** \$13,860.00 **Total Previous Billings Payments** -5,860.00 Payment - Nye County Treasurer 08/26/2024

Document 160-1

Filed 02/28/25

Case 3:24-cv-00065-MMD-CSD

**Balance Due** 

Please Remit

Nye County (Self Insured)

Page: 6

\$11,380.00

\$11,380.00

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# ERICKSON, THORPE& SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### **INVOICE 11-30-24-BLR**

Statement Date:

11/30/2024 974690

Statement No. Account No.

603709.0

Nye County (Self Insured) Lorina Dellinger, Acting County Manager Nye County 2100 E. Walt Williams Drive Ste. 100 Pahrump, NV 89048

Doe v. Nye County Insured: Nye County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**

| <u>1 E E E</u>  |   |   |   |
|---|---|---|---|
| Begin research for Reply brief in support of Motion for Certification of Final Judgment; begin with analysis of all briefing stemming from "Order to Show Cause," requiring Plaintiff to show cause why subject matter jurisdiction should extend to brothels, attempting to gauge likelihood brothels may be dismissed, which Plaintiff argues in Opposition to Motion for Cert. Of Final Judgment would make application "premature" and also review of some of the briefing re Rule 54(b) Certification from prior Williams v. Sisolak matter, and | <u>RATE</u>   | <u>HOURS</u>  |   |
| reasons stated for affording same]  | 200.00  | 0.30  | 60.00   |
| Review and analysis of case law cited in Opposition briefing [ECF No. 131]  | 200.00  | 0.40  | 80.00   |
| Research to support Reply theories as to why Final Judgment appropriate now, again focusing on "ad hoc" or fact specific nature of subject matter jurisdiction analysis, and how differences between governmental and brothel defendants would minimize danger of "overlap" or "duplication" of appellate issues and look for case law indicating that presence of readily identifiable and distinguishable classes of defendants lends itself to Rule 54(b) final judgment certification   | 200.00  | 1.00  | 200.00  |
| Research seeking case law holding that when important political or public policy questions are at stake, final judgment status under Rule   |   |   |   |
|   | Begin research for Reply brief in support of Motion for Certification of Final Judgment; begin with analysis of all briefing stemming from "Order to Show Cause," requiring Plaintiff to show cause why subject matter jurisdiction should extend to brothels, attempting to gauge likelihood brothels may be dismissed, which Plaintiff argues in Opposition to Motion for Cert. Of Final Judgment would make application "premature" and also review of some of the briefing re Rule 54(b) Certification from prior Williams v. Sisolak matter, and especially resultant Order granting Rule 54(b) Certification [and reasons stated for affording same]  Review and analysis of case law cited in Opposition briefing [ECF No. 131]  Research to support Reply theories as to why Final Judgment appropriate now, again focusing on "ad hoc" or fact specific nature of subject matter jurisdiction analysis, and how differences between governmental and brothel defendants would minimize danger of "overlap" or "duplication" of appellate issues and look for case law indicating that presence of readily identifiable and distinguishable classes of defendants lends itself to Rule 54(b) final judgment certification  Research seeking case law holding that when important political or | Begin research for Reply brief in support of Motion for Certification of Final Judgment; begin with analysis of all briefing stemming from "Order to Show Cause," requiring Plaintiff to show cause why subject matter jurisdiction should extend to brothels, attempting to gauge likelihood brothels may be dismissed, which Plaintiff argues in Opposition to Motion for Cert. Of Final Judgment would make application "premature" and also review of some of the briefing re Rule 54(b) Certification from prior Williams v. Sisolak matter, and especially resultant Order granting Rule 54(b) Certification [and reasons stated for affording same]  Review and analysis of case law cited in Opposition briefing [ECF No. 131]  Research to support Reply theories as to why Final Judgment appropriate now, again focusing on "ad hoc" or fact specific nature of subject matter jurisdiction analysis, and how differences between governmental and brothel defendants would minimize danger of "overlap" or "duplication" of appellate issues and look for case law indicating that presence of readily identifiable and distinguishable classes of defendants lends itself to Rule 54(b) final judgment certification  Research seeking case law holding that when important political or | Begin research for Reply brief in support of Motion for Certification of Final Judgment; begin with analysis of all briefing stemming from "Order to Show Cause," requiring Plaintiff to show cause why subject matter jurisdiction should extend to brothels, attempting to gauge likelihood brothels may be dismissed, which Plaintiff argues in Opposition to Motion for Cert. Of Final Judgment would make application "premature" and also review of some of the briefing re Rule 54(b) Certification from prior Williams v. Sisolak matter, and especially resultant Order granting Rule 54(b) Certification [and reasons stated for affording same]  Review and analysis of case law cited in Opposition briefing [ECF No. 131]  Research to support Reply theories as to why Final Judgment appropriate now, again focusing on "ad hoc" or fact specific nature of subject matter jurisdiction analysis, and how differences between governmental and brothel defendants would minimize danger of "overlap" or "duplication" of appellate issues and look for case law indicating that presence of readily identifiable and distinguishable classes of defendants lends itself to Rule 54(b) final judgment certification  Research seeking case law holding that when important political or |

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Nye County (Self Insured)

09/27/2024

| Nye oc            | Julity (O           | on moundary  | Statement | : No: | 974690 |
|-------------------|---------------------|--|-----------|-------|--------|
| Doe v.<br>Insured | Nye Cor<br>d: Nye C | unty   |           |       |        |
|                   |                     |  | RATE      | HOURS |        |
|                   |                     | 54(b) should be afforded; research to determine if fact that taxpayers are footing defense costs may lend itself to Rule 54(b) certification   | 200.00    | 0.70  | 140.00 |
|                   | BLR                 | Receipt, review and analysis of Plaintiff's detailed response to request for judicial notice filed by Russell Greer, review and analysis of various cited authorities and consideration of whether response required   | 200.00    | 0.40  | 80.00  |
| 09/25/2024        | PMB                 | Continue research for Reply arguments in Support of Motion for Certification and Entry of Final Judgment and continue research looking at any issues of particular "public interest" as being prone to Rule 54(b) certification, also seeking cases placing political and public policy matters as conducive to separate final judgment status; then research examining wholesale confusion generated by multitude of conflicting tests developed by varying circuits to determine if Rule 54(b) certification is appropriate, and also seek out case law specifically holding that decision still boils down to discretion of trial judge, who is in best position to make decision | 200.00    | 0.70  | 140.00 |
| 09/26/2024        | РМВ                 | Begin preparation of Reply in Support of Motion for Certification and Entry of Final Judgment [ECF No. 120], Introduction, leading into main argument re claims easily distinguishable and little risk of duplication and overlap of appellate issues, critical public interest in important public policy and political concerns over system of legalized prostitution as dictating that court finalize certification of  |           |       |        |

|     | important public policy and political concerns over system of legalized prostitution as dictating that court finalize certification of judgment of governmental defendants; importance of discretion of the trial judge and how that discretion should be exercised in favor of government defendants; how Plaintiff's arguments that dismissal of brothel defendants will be better time to give finality to judgment is not supported by fact that various issues will remain pending in docket; and request for written reasoning of why finality is being granted within any putative order [since last Order in Williams v. Sisolak case had NONE, and would have stricken if appealed]; also draft brief conclusion | 200.00 | 0.70 | 140.00 |
|-----|---|--------|------|--------|
| BLR | Receipt, review and analysis of State Defendants' Joinder to reply in   | 200.00 | 0.10 | 20.00  |

| DLK | support of motion for final judgment certification   | 200.00 | 0.10 | 20.00 |
|-----|--|--------|------|-------|
|     | Detailed work in preparation of reply brief in support of motion for final judgment certification, the bulk prepared by Attorney Bertone, including preparation of additional introduction and discussion of | 200.00 | 0.70 | 140.0 |

|     | case facts, procedure, etc.  | 200.00 | 0.70 | 140.00 |
|-----|--|--------|------|--------|
| BLR | Preparation of email reports to each set of clients, claims representatives and/or county representatives, various email conferences in response to same | 200.00 | 0.20 | 40.0   |
| РМВ | Review and revise Reply in Support of Motion to Certify Final  | 200.00 | 0.70 | 140.0  |

|            |     | Judgment to final form  | 200.00 | 0.70 | 140.0 |
|------------|-----|---|--------|------|-------|
| 09/30/2024 | BLR | Receipt, review and analysis of Court's order denying Hacienda<br>Defendants' request for extension | 200.00 | 0.10 | 20.0  |

BLR Receipt, review and analysis of Plaintiff's combined motion to strike

974690

Nye County (Self Insured)

Doe v. Nye County Insured: Nye County

| insured:   | Nye Co | ounty  |        |       |        |
|------------|--------|--|--------|-------|--------|
|            |        |  | RATE   | HOURS |        |
|            |        | Hacienda Defendants' response to motion for default, consideration of whether response is required, also note filing in separate docket entries and notes to file re: same   | 200.00 | 0.20  | 40.00  |
|            | PMB    | Begin research on standards utilized for availability of sanctions under 28 USC 1927, and especially focusing on any time requirements and when Motion seeking such relief may be filed  | 200.00 | 0.10  | 20.00  |
| 10/01/2024 | BLR    | Email conferences with counsel for Hacienda Defendants re: briefing and pending motions  | 200.00 | 0.10  | 20.00  |
|            | BLR    | Receipt, review and analysis of Western Best Defendants joinder to order to show cause briefing and/or response  | 200.00 | 0.10  | 20.00  |
|            | PMB    | Continue with research on request for fees as sanctions under 28 USC 1927, especially when request may be made, if final judgment required, and also collecting favorable standards/questionable tactics discussed in case law and which plaintiff here has also engaged in  | 200.00 | 1.30  | 260.00 |
| 10/02/2024 | BLR    | Review and analysis of briefing materials in preparation for hearing on pseudonym issue in ongoing Williams case, in federal court in Las Vegas before Magistrate Judge MDC, representation of clients (observation only) during hearing, also conferences with counsel before and following same, notes to file re: hearing and ruling by Court, review of minute order   | 200.00 | 0.90  | 180.00 |
|            | BLR    | Travel from Reno office to Las Vegas federal court via air and car for hearing on pseudonym  | 100.00 | 1.10  | 110.00 |
|            | BLR    | Return travel from Las Vegas federal court to Reno office, via air and car, following hearing  | 100.00 | 1.20  | 120.00 |
|            | РМВ    | to opposing counsel, whether under 28 USC 1927, Rule 11, or inherent power of the court, and particularly for the tactic of a plaintiff's use of serial complaints to repeatedly raise identical or similar claims, making only slight changes with each pass, but amounting to a crusade or entrenched campaign of harassment against particular class of defendants  | 200.00 | 1.50  | 300.00 |
| 10/03/2024 | PMB    | Continue research focusing on finding 9th Circuit decisional law making it plain that repetitive filing of what is essentially the same suit for harassment or vexatious purposes is a violation of 28 USC 1927 and also seek cases explaining that such a tactic is a recognized exception to rule that 28 USC 1927 sanctions typically may not be assessed against the initial complaint, but only subsequent behavior/filings; also examine same behavior (repetitive filings) as justifying sanctions in the form of fees under the inherent power of the court, and also attempting to focus on cases out of Ninth Circuit courts | 200.00 | 0.30  | 60.0   |
| 10/04/2024 | BLR    | R Email conference with counsel for SHAC LLC re: recent hearing on pseudonym issue   | 200.00 | 0.10  | 20.0   |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 40 of 131 Page: 4 November 30, 2024

974690

Nye County (Self Insured)

Statement No:

| Doe v. N | ye County  |
|----------|------------|
| insured: | Nye County |

|            |     |   | RATE   | HOURS  |        |
|------------|-----|---|--------|--------|--------|
| 10/07/2024 | PMB | Begin preparation of legal memorandum of findings re possibility of award of fees under 28 USC 1927   | 200.00 | 0.30   | 60.00  |
| 10/08/2024 | BLR | Receipt, review and analysis of lengthy case law memo from<br>Attorney Bertone compiling research re: motion for attorney's fees,<br>consideration of application and notes to file re: same  | 200.00 | 0.20   | 40.00  |
|            | PMB | Conclude memorandum re availability of legal fees under methods other than 42 USC 1988, including 28 USC 1927, inherent power of the court, and Fed.R.Civ.P. 11, edit and revise to final   | 200.00 | 1.00   | 200.00 |
| 10/09/2024 | BLR | Receipt, review and analysis of proposed intervenor's motion for hearing, notes to file re: same  | 200.00 | 0.10   | 20.00  |
| 10/11/2024 | BLR | Preparation of email reports re: recent research and potential motion for attorney's fees to clients and representatives  | 200.00 | 0.10   | 20.00  |
| 10/13/2024 | BLR | Email conferences with Nye County DA Brian Kunzi re: reporting and defense litigation strategy  | 200.00 | 0.20   | 40.00  |
| 10/14/2024 | BLR | Receipt, review and analysis of opposition by Bella's defendants re:<br>Motion to strike filed by Plaintiff   | 200.00 | 0.10   | 20.00  |
| 10/18/2024 | BLR | Receipt, review and analysis of District Court's detailed order addressing various pending motions, most notably denial of motion to proceed via pseudonym, consideration of impact on case and notes to file re: same  | 200.00 | 0.30   | 60.00  |
| 10/21/2024 | РМВ | Review and analysis of Order [ECF No. 141] making several critical determinations, allowing case to proceed against brothel defendants based on federal anti-sex trafficking statutes, and especially denying the Plaintiff's Motion for Protective Order and therefore the ability of the plaintiff to proceed under a pseudonym, and as such also ordering that plaintiff either reveal name or have suit dismissed without prejudice   | 200.00 | 0.20   | 40.00  |
|            | PME | Telephone conference with Deanna Forbush (counsel for one of brothels) discussing implications of ruling on anticipated motions for fees, and especially discussing the best procedural means of placing the above referenced Order before the court in related matter of Williams v. Sisolak, which has yet to rule on similar Motion for Protective Order where plaintiff is likewise seeking to proceed under pseudonym  | 200.00 | 0.20   | 40.0   |
| i.         | PMI | Preparation of brief correspondence to Attorney Forbush, recommending procedural strategy and forwarding entirety of briefing on various Motions to Supplement Record or Motions to Take Judicial Notice (and including court order granting such requests), to Attorney Forbush to assist her in placing Order [ECF No. 141] before court in related matter of <i>Williams v. Sisolak</i> , so that such court may consider Order when ruling on similar pending Motion for Protective Order | 200.00 | ) 0.10 | 20.0   |
|            | BL  | R Receipt, review and analysis of email correspondence from   |        |        |        |

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Nye County (Self Insured)

| Nye Co     | anty (Sei | in modera)   | Statement I | No:   | 974690       |
|------------|-----------|--|-------------|-------|--------------|
|            | Nye Cou   |  |             |       |              |
|            | ,         | ,  | RATE        | HOURS |              |
|            |           | proposed intervenor Russell Greer re: lawsuit, consideration of response and notes to file re: same  | 200.00      | 0.10  | 20.00        |
|            |           | Preparation of email report to counsel re: recent decision and consideration of impact on pseudonym briefing, telephone conference re: same  | 200.00      | 0.10  | 20.00        |
|            | BLR       | Detailed telephone conference with DA Brian Kunzi re: defense litigation strategy and reporting requirements, notes to file re: same   | 200.00      | 0.20  | 40.00        |
| 10/22/2024 | BLR       | Email conferences with representative of private defendants re: recent decision from Judge Du and notice to Court re: same   | 200.00      | 0.10  | 20.00        |
|            | BLR       | Preparation of detailed email report to clients and County representative re: Court's decision on pseudonym and other issues, defense litigation strategy  | 200.00      | 0.30  | 60.00        |
| 10/23/2024 | РМВ       | matter, wherein brothel defendants in the related williams v. Glacian matter, wherein brothel defendants are attempting to ensure that district court in that Williams matter is aware that judge in Doe v. Lombardo matter has denied protective order and demanded that plaintiff reveal her true name   | 200.00      | 0.10  | 20.00        |
|            | PMB       | Proposed Intervenor's Motion for Hearing/Oral Argument and Motion to Strike (ECF Nos. 142&143)   | 200.00      | 0.20  | 40.00        |
|            | BLR       | Receipt, review and analysis of Plaintiff's response to Russell Greer motions, also filed as motion to strike, consideration of whether any response required and notes to file re: same   | 200.00      | 0.20  | 40.00        |
| 10/28/2024 | PMB       | Review and analysis of "Status Report" filed in Williams v. Sisolak, which includes declarations of both "Jane Doe" prostitutes and which seem to address the shortcomings delineated in Denial of Protective Order refusing to allow prostitute to proceed pseudonymously in Doe v. Lombardo and prepare correspondence to counsel for Brothel, Attorney Deanna Forbush, pointing out opinion that declarations constitute surreply argument, without leave to amend (n/c); review and analysis of Reply by Proposed Intervenor Greer (ECF No. 144), chronicling various propaganda and clisinformation campaigns still being waged "online" by NCOSE and Jason Guinasso, of which this attorney was frankly previously unaware | 200.00      | 0.10  | 20.0         |
|            | BLR       | of Bussell Green reply in support of   | 200.00      | 0.10  | 20.0         |
|            | BLR       | the state of status report filed by Plaintiff's  | 200.00      | 0.30  | <b>60</b> .0 |
| 11/01/2024 | BLR       | R Receipt, review and analysis of Plaintiff's detailed motion for  |             |       |              |
|            |           |  |             |       | ,            |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 42 of 131 Page: 6 November 30, 2024

974690

Statement No:

Nye County (Self Insured)

| Doe v. N<br>Insured: | lye Coun<br>Nye Co | ity<br>iunty  |        |       |               |
|----------------------|--------------------|---|--------|-------|---------------|
|                      |                    |   | RATE   | HOURS |               |
|                      | (                  | reconsideration of order re: pseudonym and various other issues, consideration of potential responses and arguments, notes to file re: same   | 200.00 | 0.30  | 60.00         |
| 11/04/2024           |                    | Receipt, review and analysis of detailed response to motion to strike filed by Plaintiffs re: pseudonym issue, consideration of issues raised and notes to file re: same  | 200.00 | 0.20  | 40.00         |
| 8                    |                    | Receipt, review and analysis of proposed intervenor's detailed response to motion for reconsideration, as well as separately-filed motion for judicial notice, consideration of whether response required and notes to file re: same                              | 200.00 | 0.20  | 40.00         |
| 11/11/2024           |                    | Receipt, review and analysis of Plaintiff's motion to strike documents filed by Russell Greer, review docket re: same and consideration of joinder, notes to file re: same  | 200.00 | 0.10  | 20.00         |
| 11/12/2024           | РМВ                | Review and analysis of Defendants' combined Reply in Support of Motion to Strike in the Williams v. Sisolak action, which is attempting to strike the supplemental declarations of the Doe plaintiffs in support of their ability to proceed pseudonymously (n/c) | 200.00 |       | 0.00          |
| 11/14/2024           | PMB                | Review and analysis of Defendant Chicken Ranch's Opposition to Motion for Reconsideration (ECF No. 148) of Order denying the plaintiff the ability to proceed pseudonymously, and review of numerous joinders by other defendants in said motion                  | 200.00 | 0.10  | 20.00         |
| 11/15/2024           | PMB                | Review Desert Rose's Motions for Sanctions Pursuant to Rule 11 against plaintiff (.1)(n/c)  | 200.00 |       | 0.00          |
|                      | BLR                | Receipt, review and analysis of Western Best response to motion for reconsideration, consideration of joinder/response and notes to file re: same, also note joinders filed three additional defendants, etc.   | 200.00 | 0.20  | 40.0          |
| 11/20/2024           | РМВ                | (brothel counsel) re potential appellate strategies to overtaining protective order and perceived weaknesses in same  | 200.00 | 0.10  | 20.0          |
| 11/21/2024           | BLR                | of motion for reconsideration, consideration of arguments processed and notes to file re: same  | 200.00 | 0.20  | 40.0          |
|                      | BLR                | underlying Williams action, consideration of effect of remaining litigation and notes to file re: same, also review and analysis of separately-filed protective order, consideration of application   | 200.00 | 0.20  | 40.0          |
| 11/23/2024           | BLR                | litigation strategy to all client representatives, various email conferences in response to same  | 200.00 | 0.30  | 60.0          |
| 11/27/2024           | BLR                | Rule 11 motion filed by Desert Rose club, Hotes to file 15: 325   | 200.00 | 0.20  | 40.<br>3,690. |
|                      |                    | For Current Services Rendered:  |        |       |               |

Page 43 of 131 Page: 7 November 30, 2024 Filed 02/28/25 Case 3:24-cv-00065-MMD-CSD Document 160-1 Nye County (Self Insured) 974690 Statement No: Doe v. Nye County Insured: Nye County Recapitulation **TOTAL** Rate **Hours** Timekeeper \$230.00 \$100.00 2.30 Brent L. Ryman 1,440.00 200.00 7.20 Brent L. Ryman 2,020.00 200.00 10.10 Paul M. Bertone Expenses

119.99

-3,380.00

|            |  | 119.55     |
|------------|--|------------|
| 10/02/2024 | Travel expense - Southwest Airlines              | 2.69       |
| 10/02/2024 | Travel expense - fuel                            | 1.34       |
| 10/02/2024 | Travel expense - parking                         | 12.00      |
| 10/02/2024 | Travel expense - Reno Tahoe Airport (parking)    | 41.38      |
| 10/02/2024 | Travel expense - Hertz Car Rental Total Expenses | 177.40     |
|            |  |            |
|            |  | 3,867.40   |
|            | Total Current Work                               |            |
|            |  | \$3,380.00 |
|            | Total Previous Billings                          |            |
|            |  |            |

**Payments** 

Payment - Nye County 11/05/2024 \$3,867.40 **Balance Due** \$3,867.40

Please Remit



MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505 ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

**INVOICE 01-31-25-BLR** 

Statement Date: Statement No. Account No. 01/31/2025 974713 603709.0

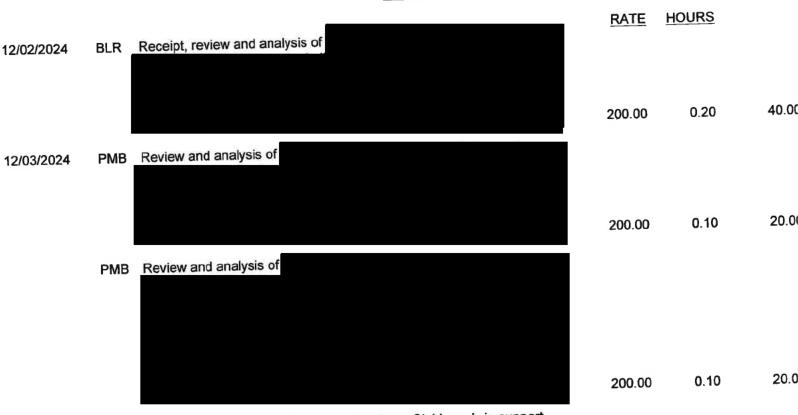
Nye County (Self Insured)
Lorina Dellinger, Acting County Manager
Nye County
2100 E. Walt Williams Drive Ste. 100
Pahrump, NV 89048

Doe v. Nye County Insured: Nye County

12/04/2024

For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**



BLR Receipt, review and analysis of Desert Rose Club's reply in support

|               |                 | 3:24-cv-00065-MMD-CSD  | Document 160-1                           | Filed 02/28/25           | Page 45     | of 131<br>January  | Page: 2<br>ry 31, 2025 |
|---------------|-----------------|--|--|--------------------------|-------------|--------------------|------------------------|
| Nye Cot       | unty (Sel       | lf Insured)  |  |                          | Statement N |                    | 974713                 |
| Doe v. I      | Nye Coui        | intv   |  |                          |             |                    |                        |
| Insured       | : Nye Co        | ounty  |  |                          |             |                    |                        |
|               |                 |  |  |                          | RATE        | HOURS              | 20.00                  |
|               |                 | of motion for sanctions  |  |                          | 200.00      | 0.10               | 20.00                  |
| 12/06/2024    | BLR _           | Receipt, review and analysis of                                  |  |                          |             |                    |                        |
| 12100.20      |                 |  |  |                          | 200.00      | 0.20               | 40.00                  |
|               | 1               |  |  |                          | 200.00      | 0.20               | 10.22                  |
| 12/09/2024    | BLR             | Receipt, review and analysis of                                  |  |                          | 200.00      | 0.10               | 20.00                  |
|               | !               | 4  |  |                          |             |                    |                        |
| 12/17/2024    | PMB             | Conduct research on  |  |                          |             |                    |                        |
|               | ļ               |  |  |                          |             |                    |                        |
|               | !               |  |  |                          |             |                    |                        |
|               | !               |  |  |                          |             |                    |                        |
|               | !               |  |  |                          | 200.00      | 0.30               | 60.00                  |
|               | -: <b>-</b> : - | - description  |  |                          |             |                    | ļ                      |
| 01/16/2025    | BLR             | Review and analysis of   |  |                          |             |                    |                        |
|               |                 |  |  |                          | 200.00      | 0.10               | 20.00                  |
| - : :00:1000E | DI D            | Receipt, review and analysis of                                  | ıf Caracteristic                         |                          |             |                    |                        |
| 01/22/2025    | BLR             | Receipt, review and analysis                                     |  |                          |             |                    |                        |
|               |                 |  |  |                          | 200.00      | 0.30               | 60.00                  |
|               |                 |  |  |                          | 200.00      |                    |                        |
| 01/23/2025    | BLR             | Receipt, review and preliminar arbitration, also separate motion | y analysis of motion to conto stay case, | compel                   |             |                    |                        |
|               |                 | arbitration, also separate mode                                  | into stay see-,                          |                          | 200.00      | 0.10               | 20.00                  |
|               |                 | CVCalling reality  |  |                          |             |                    |                        |
| 01/24/2025    | BLR             | Preparation of email report to                                   | County officials re:                     |                          |             | 0.40               | 80.00                  |
|               |                 |  |  |                          | 200.00      | 2.00               | 400.0                  |
|               |                 | For Current Services Rendere                                     |  |                          |             | <b></b>            |                        |
|               |                 |  | Recapitulation<br>H                      |                          |             | TOTAL              |                        |
|               | В               | <u>"imekeeper</u><br>Brent L. Ryman                              |  | 1.50 \$200.<br>0.50 200. | 0.00 \$     | \$300.00<br>100.00 |                        |
|               |                 | Paul M. Bertone  |  | 0.50                     | .00         |                    |                        |
|               |                 | Total Current Work   |  |                          |             |                    | 400.0                  |
|               |                 |  |  |                          |             |                    | \$3,867.4              |
|               |                 | Total Previous Billings  |  |                          |             |                    |                        |
|               |                 |  | <u>Payments</u>                          |                          |             |                    | -3,867.4               |
| 01/03/2025    |                 | Payment - Nye County Treas                                       | urer                                     |                          |             |                    | -0,00                  |

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Filed 02/28/25

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Nye County (Self Insured)

Statement No:

974713

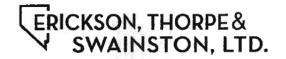
Doe v. Nye County Insured: Nye County

Balance Due

\$400.00

Please Remit

\$400.00



MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

#### ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### INVOICE 04-30-24-BLR

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

04/30/2024 Statement Date: Statement No. 973452 Account No. 25.47851

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

### **FEES**

| 02/15/2024 | BLR Detailed telephone conference with Courtney Sweet, attorney for | RATE   | <u>HOURS</u> |      |        |
|------------|---|--|--------------|------|--------|
|            |   | defendant brothel and owner, re:                                 | 225.00       | 0.10 | 22.50  |
|            | BLR   | Receipt, review and detailed analysis of lengthy complaint and   |              |      |        |
|            |   |  | 225.00       | 0.50 | 112.50 |
|            | BLR   | Receint review and analysis of notice of judicial assignment and |              |      |        |
|            |   |  | 225.00       | 0.20 | 45.00  |
|            | BLR   | Receipt, review and analysis of filed summonses.                 | 225.00       | 0.10 | 22.50  |
|            | BLR   | Detailed telephone conference with Storey County DA Ann Langer   |              |      |        |
| BLF        |   | re:  | 225.00       | 0.40 | 90.00  |
|            | BLR   | Email conferences with claims representative Donna Squires re:   |              |      |        |
|            |   |  | 225.00       | 0.30 | 67.50  |

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973452

Statement No:

|                      |        | -,,   |        |       |        |
|----------------------|--------|---|--------|-------|--------|
| 02/16/2024           | РМВ    | Conduct minor supplemental research         | RATE   | HOURS |        |
|                      |        |   |        |       |        |
|                      |        |   | 225.00 | 0.40  | 90.00  |
|                      | PMB    | Begin preparation of Motion to Dismiss      |        |       |        |
| 02/19/2024           | РМВ    | Continue -                                  | 225.00 | 1.10  | 247.50 |
| 32.73.2 <b>32</b> .7 |        |   | 225.00 | 0.60  | 135.00 |
|                      | PMB    | Continue supplemental research:             |        |       |        |
|                      |        |   |        |       |        |
| 02/20/2024           | PMB    | Continue preparation of                     | 225.00 | 0.10  | 22.50  |
| 32/23/2324           | . 1012 | Continue preparation on                     | 225.00 | 1.50  | 337.50 |
| 02/21/2024           | PMB    | Continue preparation of                     | 225.00 | 0.30  | 67.50  |
| 02/22/2024           | PMB    | Continue preparation of                     |        |       |        |
|                      | DI D   |   | 225.00 | 0.90  | 202.50 |
|                      | BLR    | Work in preparation of                      | 225.00 | 0.80  | 180.00 |
| 02/23/2024           | BLR    | Detailed work in preparation of             | 223.00 | 0.00  | 100.00 |
|                      |        |   | 225.00 | 1.20  | 270.00 |
|                      | PMB    | Conduct some minor supplemental research on |        |       |        |
|                      |        |   |        |       |        |
|                      |        |   |        |       |        |
|                      | PMB    | Work in                                     | 225.00 | 0.40  | 90.00  |
|                      |        |   | 225.00 | 0.80  | 180.00 |
|                      |        |   |        |       |        |

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Statement No:

973452

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
| 02/24/2024 | BLR | Preparation of detailed email to clients re:  |        |       |        |
|            |     |   | 225.00 | 0.30  | 67.50  |
|            | BLR | Detailed work   |        |       |        |
|            |     |   | 225.00 | 2.10  | 472.50 |
| 02/26/2024 | BLR | Various email conferences among clients re:   |        |       |        |
|            |     |   | 225.00 | 0.10  | 22.50  |
| 02/27/2024 | PMB | Begin research on   |        |       | 8      |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 1.00  | 225.00 |
| 02/28/2024 | PMB | continue with research  |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 1.00  | 225.00 |
|            | PMB | Also examine  |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 1.00  | 225.00 |
| 02/29/2024 | РМВ | Continue research on  |        |       |        |
|            |     |   | 225.00 | 0.30  | 67.50  |
|            | PMB | Review and analysis of Motion to Dismiss for Violation of FRCP 8(a), or in the Alternative, Motion to Strike for Violation of FRCP 12(f), filed |        |       |        |
|            |     | by counsel for Mustang Ranch and Gilman   | 225.00 | 0.10  | 22.50  |
|            | PMB |   |        |       |        |
|            |     | Practice to All National Center on Sexual Exploitation Attorneys Listed on Complaint (ECF No. 1).   |        |       |        |
|            |     |   | 225.00 | 2.00  | 450.00 |
|            | BLR | Receipt, review and analysis of Court's detailed order re: case management conference and joint case management statement.                      |        |       |        |
|            |     |   | 225.00 | 0.10  | 22.50  |
|            |     |   |        |       |        |

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Statement No:

973452

|            | BLR | Receipt, review and analysis of Magistrate Judge Baldwin standing order,  | RATE   | HOURS | 22.52  |
|------------|-----|---|--------|-------|--------|
|            |     | order,  | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Mustang Ranch Defendants joinder to motion to dismiss                           | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Mustang Ranch Defendant's required disclosure/certificate of interested parties | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Mustang Ranch Defendants' Motion to Dismiss.                                    |        |       |        |
| 03/01/2024 | РМВ | Continue preparation of   | 225.00 | 0.30  | 67.50  |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 2.10  | 472.50 |
|            | BLR | Preparation of  |        |       |        |
|            |     |   | 225.00 | 1.20  | 270.00 |
|            | BLR | Preparation of certificate of interested parties as required by rules   | 225.00 | 0.10  | 22.50  |
|            | BLR | Preparation of email report to clients and claims representative re:  |        |       |        |
|            |     |   | 225.00 | 0.20  | 45.00  |
| 03/04/2024 | РМВ | Begin initial preparation for   |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 0.40  | 90.00  |
| 03/05/2024 | PMB | Continue with review and analysis of  |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 0.40  | 90.00  |
|            |     |   |        |       |        |

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April 30, 2024

Doe v. Storey County Statement No: 973452

Claim No.: P243-24-08998-01 Insured: Storey County

| 03/07/2024   | PMB     | Continue   | RATE   | <u>HOURS</u> |        |
|--------------|---------|--|--------|--------------|--------|
| 00// 1/2-2-1 | <b></b> |  | 225.00 | 0.30         | 67.50  |
| 03/11/2024   | PMB     | Continue review and analysis of  | 225.00 | 0.50         | 112.50 |
|              | PMB     | Begin conducting research to   | 225.00 | 0.30         | 67.50  |
|              | BLR     | Receipt, review and preliminary analysis of Plaintiff's opposition to motion to dismiss for improper use of pseudonym.   | 225.00 | 1.20         | 270.00 |
| 03/12/2024   | РМВ     | Review and analysis of Opposition to Nye County, Elko County and Storey County's (including Leonard "Lance" Gilman in his Official Capacity) Motion to Dismiss for Improper Use of Pseudonym Resulting in Lack of Subject Matter Jurisdiction. | 225.00 | 0.20         | 45.00  |
|              | PMB     | Begin research for reply by analysis of  |        |              |        |
|              | PMB     | Begin research   | 225.00 | 1.70         | 382.50 |
|              |         |  | 225.00 | 0.70         | 157.50 |
| 03/13/2024   | PMB     | Research to  |        |              |        |
|              |         |  |        |              |        |
|              |         |  | 225.00 | 1.60         | 360.00 |
|              | PMB     | Conduct research   |        |              |        |
|              |         |  | 225.00 | 0.30         | 67.50  |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Jasmine Sanchez

Filed 02/28/25

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Statement No:

973452

| msured     | . Store | ey County  |             |       |                 |
|------------|---------|--|-------------|-------|-----------------|
| 03/14/2024 | PMB     | Preparation of   | <u>RATE</u> | HOURS |                 |
|            |         |  | 225.00      | 2.00  | 450.00          |
|            | BLR     | Receipt, review and analysis of Plaintiff's detailed opposition to motion to dismiss filed by Brothel Defendants,                | 225.00      | 0.40  | 90.00           |
| 03/15/2024 | PMB     | Complete   | 225.00      | 1.50  | 337.50          |
|            | BLR     | Receipt, review and preliminary analysis of opposition to motion to deny pro hac vice applications filed by Plaintiff's counsel, | 225.00      | 0.50  | 442.50          |
| 03/18/2024 | РМВ     | Conduct minor research on  | 225.00      | 0.50  | 112.50<br>22.50 |
|            | РМВ     | Review   | 225.00      | 0.10  | 22.50           |
|            | РМВ     | Review and revise  | 225.00      | 0.50  | 112.50          |
|            | PMB     | After Attorney Ryman has   | 225.00      | 0.20  | 45.00           |
|            | PMB     | Review and analysis of Opposition to Motion to Deny Pro Hac Vice Admission,  | 225.00      | 0.30  | 67.50           |
|            | PMB     | Begin research for   | 225.00      | 0.20  | 45.00           |
|            | BLR     | Complete preparation of  |             |       |                 |
| 03/19/2024 | BLR     | Receipt, review and analysis of Mustang Ranch Defendants' Joinder to reply briefing in support of motion                         | 225.00      | 1.50  | 337.50          |
|            |         | to dismiss for improper use of pseudonym   | 225.00      | 0.10  | 22.50           |
| 03/20/2024 | РМВ     | Continue with research on  |             |       |                 |

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Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

|            |     | ,   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 225.00 | 0.50  | 112.50 |
|            | PMB | Also research   | 225.00 | 0.20  | 45.00  |
|            | РМВ | Continue  | 223.00 | 0.20  | 40.00  |
|            |     |   | 225.00 | 2.00  | 450.00 |
|            | PMB | Preparation of  | 225.00 | 0.10  | 22.50  |
| 03/21/2024 | РМВ | Research  |        |       |        |
|            |     |   |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 0.80  | 180.00 |
|            | PMB | Conclude  | 225.00 | 0.80  | 180.00 |
|            | PMB | Edit and revise   | 225.00 | 0.40  | 90.00  |
|            | PMB | Review and analysis of Reply in Support of Mustang Ranch's Motion to Dismiss as per Rule 8(a)                             | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Mustang Rang Reply Briefing in response to Rule 8 motion to dismiss/ opposition briefing, |        |       |        |
|            | BLR | Receipt, review and analysis of various returns of summonses for  | 225.00 | 0.30  | 67.50  |
|            |     | individual and corporate defendants,  | 225.00 | 0.20  | 45.00  |
| 03/22/2024 | PMB | Assist with   | 225.00 | 0.40  | 00.00  |
|            | BLR | Receipt, review and analysis of   | 225.00 | 0.40  | 90.00  |
|            |     |   | 225.00 | 0.30  | 67.50  |
|            | BLR | Detailed work   |        |       |        |
|            |     |   |        |       |        |

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April 30, 2024

Statement No:

973452

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

RATE **HOURS** 225.00 1.00 225.00 BLR Preparation of email report to clients and claims representative re: 225.00 0.20 45.00 03/25/2024 PMB Dive into 225.00 1.30 292.50 03/26/2024 PMB Continue with detailed research on 225.00 2.00 450.00 03/27/2024 PMB Begin preparation of 225.00 1.30 292.50 **PMB** Supplemental research on

Statement No:

973452

|            |     |  | RATE   | HOURS |        |
|------------|-----|--|--------|-------|--------|
|            |     |  | 225.00 | 0.20  | 45.00  |
| 03/28/2024 | PMB | Conduct supplemental research on   | 225.00 | 0.20  | 45.00  |
|            | PMB | Continue preparation of  | 225.00 | 0.30  | 67.50  |
|            | PMB | Continue preparation of  | 225.00 | 0.30  | 67.50  |
| 03/29/2024 | PMB | Continue preparation of  |        |       |        |
|            |     |  | 225.00 | 1.20  | 270.00 |
| 04/01/2024 | PMB | Review and analysis of State Defendants' Motion to Dismiss the Complaint Pursuant to FRCP 12(b)(1), 12(b)(6), 8(a) or in the Alternative, Motion to Strike The Complaint for Violation of FRCP 12(f) |        |       |        |
|            | BLR | Receipt, review and detailed analysis of Motion to Dismiss filed by  | 225.00 | 0.20  | 45.00  |
|            |     | State of Nevada,   | 225.00 | 0.40  | 90.00  |
|            | BLR | Receipt, review and analysis of initial appearance materials filed by State  | 225.00 | 0.10  | 22.50  |
| 04/02/2024 | РМВ | Research for   | 225.00 | 0.80  | 180.00 |
|            | PMB | Preparation of s   | 225.00 | 0.90  | 202.50 |
|            | PMB | Review and analysis of State Defendants' Motion to Stay Discovery, as well as various other minor filings [notices of appearances, etc.] filed over the course of the day                            | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Mustang Ranch Defendants joinder in State Defendants' Motion to Dismiss  | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of State Defendants' Motion to Stav Discovery.  | 225.00 | 0.20  | 45.00  |

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Statement No:

|            | ם ום | Description and analysis of nation of appropriate along with  | RATE   | HOURS |        |
|------------|------|---|--------|-------|--------|
|            | BLR  | Receipt, review and analysis of notice of appearance along with series of joinders (x5) filed by Desert Rose Defendants | 225.00 | 0.20  | 45.00  |
| 04/03/2024 | PMB  | Conduct research or   | 225.00 | 0.10  | 22.50  |
| `          | PMB  | Preparation of  |        |       |        |
|            |      |   | 225.00 | 0.20  | 45.00  |
|            | РМВ  | Conduct research to   |        |       |        |
|            |      |   | 225.00 | 0.10  | 22.50  |
|            | PMB  | Conduct research on   |        |       |        |
|            |      |   | 225.00 | 0.70  | 157.50 |
|            | PMB  | Conduct research  |        |       |        |
|            |      |   |        |       |        |
|            |      |   |        |       |        |
|            |      |   |        |       |        |
|            |      |   |        |       |        |
|            |      |   |        |       |        |
|            |      |   | 225.00 | 3.00  | 675.00 |
| 04/04/2024 | РМВ  | Conduct research on   |        |       |        |
|            |      |   | 225.00 | 0.30  | 67.50  |
|            | РМВ  | Continue preparation of   |        |       |        |
|            |      |   |        |       |        |
|            |      |   | 225.00 | 1.70  | 382.50 |
|            | BLR  | Review and analysis of  | _<br>  |       |        |
|            |      |   | 225.00 | 0.60  | 135.00 |
| 04/05/2024 | РМВ  | Continue preparation of   | -      |       |        |
|            |      |   |        |       |        |
|            |      |   | 225.00 | 1.20  | 270.00 |
|            | РМВ  | Preparation of  |        |       |        |
|            |      |   |        |       |        |

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|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 225.00 | 0.40  | 90.00  |
|            | PMB | Research  |        |       |        |
|            | DMD | December  | 225.00 | 0.30  | 67.50  |
|            | PMB | Preparation of  | 225.00 | 0.20  | 45.00  |
|            | BLR | Additional research   |        |       |        |
| 04/07/2024 | РМВ | Preparation of  | 225.00 | 0.40  | 90.00  |
|            |     |   | 225.00 | 0.80  | 180.00 |
|            | PMB | Conduct some supplemental research on   | 225.00 | 0.20  | 45.00  |
|            | PMB | Preparation of  | 225.00 | 0.50  | 112.50 |
|            | РМВ | Review and revise   | 225.00 | 0.50  | 112.50 |
|            |     |   | 225.00 | 1.00  | 225.00 |
|            | PMB | Review and analysis of  |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 1.00  | 225.00 |
| 04/08/2024 | BLR | Detailed work in  | 225.00 | 0.70  | 157.50 |
|            | BLR | Receipt, review and analysis of Magistrate Judge Order of recusal, reassignment of matter | 225.00 | 0.10  | 22.50  |
| 04/09/2024 | РМВ | Make  | 223.00 | 0.10  | 22.30  |
|            |     |   | 225.00 | 0.20  | 45.00  |
|            | PMB | Continue  |        |       |        |

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Statement No:

|            |     |  | RATE   | <u>HOURS</u> |        |
|------------|-----|--|--------|--------------|--------|
|            |     |  | 225.00 | 0.50         | 442.50 |
|            | BLR | Review and revision of   | 225.00 | 0.50         | 112.50 |
|            |     |  | 225.00 | 0.30         | 67.50  |
|            | BLR | Receipt, review and analysis of Court's standing order following Magistrate Judge reassignment,  | 225.00 | 0.10         | 22.50  |
| 04/10/2024 | BLR | Receipt, review and analysis of separate standing order issued by District Judge Du,   | 225.00 | 0.10         | 22.50  |
|            | BLR | Receipt, review and analysis of joinders filed by Desert Rose Defendants   | 225.00 | 0.10         | 22.50  |
|            | BLR | Email conferences among all counsel re: meet-and-confer, required filing for upcoming case management conference   | 225.00 | 0.10         | 22.50  |
| 04/11/2024 | PMB | Assist Attorney Ryman with   | 225.00 | 0.40         | 90.00  |
|            | BLR | Ongoing email conferences among all counsel re: upcoming hearing, consideration of responses to Plaintiffs' counsel request, etc., provide input on stipulation and notes to file re: same                                     | 225.00 | 0.20         | 45.00  |
|            | BLR | Detailed work  | 225.00 | 0.50         | 112.50 |
| 04/12/2024 | BLR | Complete   | 225.00 | 0.90         | 202.50 |
|            | BLR | Numerous email conferences among all counsel re: proposed stipulation, revisions and approval, etc., arguments re: various points  | 225.00 | 0.20         | 45.00  |
|            | BLR | Receipt, review and analysis of stipulation re: motion to dismiss briefing filed by Plaintiff and State Defendants   | 225.00 | 0.10         | 22.50  |
|            | BLR | Preparation of email to client representatives and claims representative re:   | 225.00 | 0.30         | 67.50  |
| 04/15/2024 | РМВ | Review and analysis of Def. Chicken Ranch's Motion for a More Definite Statement, and the Proposed Order which accompanied such Motion for the Court's consideration   | 225.00 | 0.10         | 22.50  |
|            | BLR | Receipt, review and analysis of Western Best/Chicken Ranch<br>Defendants' motion for more definite statement, also initial<br>appearance filings including certificate of interested parties, and<br>proposed order for motion | 225.00 | 0.20         | 45.00  |

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Statement No:

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|            | BLR | Receipt, review and analysis of  | RATE   | HOURS |        |
|------------|-----|--|--------|-------|--------|
|            | DLN | Necept, review and analysis or   | 225.00 | 0.20  | 45.00  |
|            | BLR | Receipt, review and analysis of Court's order on State Defendants' briefing (including Motion to Stay)   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of District Court Order referring consideration of motions to Magistrate Judge  | 225.00 | 0.10  | 22.50  |
| 04/16/2024 | BLR | Receipt, review and analysis of Court's Order granting stipulation recase management conference statement,   | 225.00 | 0.10  | 22.50  |
| 04/17/2024 | BLR | Receipt, review and analysis of State Defendants' joinder in motion to dismiss for subject matter jurisdiction                                     | 225.00 | 0.10  | 22.50  |
|            | BLR | Various email conferences among counsel re:  | 225.00 | 0.20  | 45.00  |
|            | BLR | Preparation of email report to clients re:   |        |       |        |
|            |     |  | 225.00 | 0.20  | 45.00  |
| 04/26/2024 | BLR | Receipt, review and detailed analysis of Plaintiff's opposition to motion to dismiss for lack of subject matter jurisdiction,                      | 225.00 | 0.60  | 135.00 |
| 04/28/2024 | PMB | Review and analysis of Opposition to Nye County, Elko County and Storey County's Motion to Dismiss for Failure of Subject Matter Jurisdiction:     | 225.00 | 0.30  | 67.50  |
|            | PMB | Supplemental research on f   | 225.00 | 0.20  | 45.00  |
| 04/29/2024 | BLR | Receipt, review and analysis of stipulation between Plaintiff's and Chicken Ranch Defendants re: response to Complaint, motion to dismiss briefing | 225.00 | 0.10  | 22.50  |
| 04/30/2024 | BLR | Receipt, review and analysis of Notice of Withdrawal of Motion from Chicken Ranch, in regard to motion for more definite statement,                | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of separately-filed notices of summons served for various brothel defendants  | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Court's order re: time to file motion for leave to proceed anonymously,  | 225.00 | 0.10  | 22.50  |
|            | BLR | Email conferences with Plaintiff's counsel re: request for waiver of service, response to same, notes to file re; same                             | 225.00 | 0.20  | 45.00  |

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16,762.50

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April 30, 2024

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

RATE HOURS

For Current Services Rendered:

74.50

Recapitulation

 Timekeeper
 Hours
 Rate
 TOTAL

 Brent L. Ryman
 22.10
 \$225.00
 \$4,972.50

 Paul M. Bertone
 52.40
 225.00
 11,790.00

Total Current Work 16,762.50

Balance Due \$16,762.50

Please Remit \$16,762.50

## ERICKSON, THORPE& SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

#### ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

**INVOICE 07-31-24-BLR** 

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509 Statement Date: 07/31/2024 Statement No. 974184 Account No. 25.47851

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**

| 05/01/2024 | РМВ | Research on   | <u>RATE</u> | <u>HOURS</u> |        |
|------------|-----|---|-------------|--------------|--------|
|            |     |   |             |              |        |
|            |     |   |             |              |        |
|            |     |   |             |              |        |
|            |     |   | 225.00      | 1.30         | 292.50 |
|            | PMB | Preparation of Reply in Support of Motion to Dismiss for lack of standing,  |             |              |        |
|            |     |   | 225.00      | 1.30         | 292.50 |
|            | BLR | Email conferences with Plaintiff's counsel re: acceptance of service demand for same  | 225.00      | 0.10         | 22.50  |
|            | BLR | Review and consideration of request for waiver of service for Storey County prepared by Plaintiff's counsel, email re: agreement for same | 225.00      | 0.20         | 45.00  |
| 05/02/2024 | РМВ | Continue preparation of Reply in Support of Motion to Dismiss,  | 225.00      | 1.00         | 225.00 |
|            |     |   |             |              |        |

974184

Statement No:

| Insure     | a: Store | ey County  |        |       |        |
|------------|----------|--|--------|-------|--------|
|            | DMD      | Decrease time of   | RATE   | HOURS |        |
|            | PMB      | Preparation of   | 225.00 | 1.00  | 225.00 |
|            | PMB      |  | 225.00 | 1.50  | 337.50 |
|            | BLR      | Detailed work  | 225.00 | 0.70  | 157.50 |
| 05/06/2024 | BLR      | Receipt, review and analysis of waiver of service of materials filed by Plaintiffs in regard to Mustang Ranch Defendants,  | 225.00 | 0.10  | 22.50  |
|            | BLR      | Receipt, review and analysis of email correspondence from Plaintiffs' counsel re: request to stay discovery pending motion briefing.   |        |       |        |
|            |          |  | 225.00 | 0.20  | 45.00  |
|            | PMB      | Review and analysis of Plaintiff's Opposition To State Defendant's Motion to Dismiss   | 225.00 | 0.20  | 45.00  |
| 05/07/2024 | BLR      | Ongoing email conferences among all counsel re: stipulation to continue discovery, compliance with Court's direction to meet and confer  | 225.00 | 0.10  | 22.50  |
|            | BLR      | Receipt, review and analysis of draft stipulation to continue discovery prepared by Plaintiff's counsel, email conferences re: revisions and approval of same  | 225.00 | 0.10  | 22.50  |
| 05/08/2024 | BLR      | Continuing email conferences among all counsel re: stipulation to stay discovery, order to meet and confer, etc.,  | 225.00 | 0.10  | 22.50  |
| 05/09/2024 | BLR      | Continuing email conferences among all counsel re: motion to stay, stipulation for same and meet and confer request  | 225.00 | 0.10  | 22.50  |
| 05/10/2024 | BLR      | Email conferences among all counsel re: meet and confer and<br>upcoming case management conference   | 225.00 | 0.10  | 22.50  |
| 05/13/2024 | BLR      | Email conferences among all counsel re: required case management conference statement, meet-and-confer, etc., review and revision of draft joint case management conference statement prepared by Plaintiff's counsel, preparation of detailed email to all counsel re: demanded revisions, etc. | 225.00 | 0.30  | 67.50  |
|            | BLR      | Receipt, review and analysis of filed notice of forthcoming status report prepared and filed by Plaintiff's counsel  | 225.00 | 0.10  | 22.50  |
|            | BLR      | Receipt, review and analysis of Court's order granting motion to stay discovery and related deadlines,   | 225.00 | 0.10  | 22.50  |
|            |          |  |        |       |        |

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Statement No: 974184

| Insure     | a: Store | ey County   |        |       |       |
|------------|----------|---|--------|-------|-------|
|            |          |   | RATE   | HOURS |       |
|            | BLR      | Email conferences among all counsel re: stipulation for stay of<br>discovery and upcoming case management conference  | 225.00 | 0.10  | 22.50 |
| 05/16/2024 | BLR      | Various, ongoing email conferences among all counsel re: joint case conference report, review and revision of new draft,  | 225.00 | 0.20  | 45.00 |
| 05/47/0004 | 51.5     |   | 220.00 | 0.20  | 45.00 |
| 05/17/2024 | BLR      | Numerous, ongoing email conferences among all counsel re: case<br>management conference statement and revisions, approval of same   | 225.00 | 0.20  | 45.00 |
|            | BLR      | Receipt, review and analysis of filed case management conference statement, ensure compliance with approval and notes to file re: same, stay of discovery                 | 225.00 | 0.10  | 22.50 |
|            | BLR      | Receipt, review and analysis of Chicken Ranch Defendants' joinder to motion to dismiss for improper use of pseudonym  | 225.00 | 0.10  | 22.50 |
| 05/19/2024 | BLR      |   |        |       |       |
|            |          | for Chicken Ranch re:   | 225.00 | 0.20  | 45.00 |
|            | BLR      | Review and analysis of  | 225.00 | 0.30  | 67.50 |
| 05/24/2024 | BLR      | Receipt, review and analysis of email from third party re: purported intent to intervene, allegations against brothel Defendant and Plaintiff,                            | 225.00 | 0.30  | 67.50 |
|            | BLR      | Receipt, review and analysis of stipulation and order re: Plaintiff's response to State Defendants' motion to dismiss   | 225.00 | 0.10  | 22.50 |
|            | BLR      | Conduct internet research re:   | 225.00 | 0.20  | 45.00 |
| 05/28/2024 | BLR      | Receipt, review and analysis of Court's order on stipulation related to State briefing  | 225.00 | 0.10  | 22.50 |
| 05/30/2024 | PMB      | Review and analysis of correspondence from Plaintiff seeking to satisfy "meet and confer" requirements concerning a Motion for Protective Order over Pseudonym in Caption | 225.00 | 0.10  | 22.50 |
|            | РМВ      | Begin reviewing   |        |       |       |
|            |          |   | 225.00 | 0.10  | 22.50 |
|            | РМВ      | Preparation of correspondence to Plaintiff's counsel  |        |       |       |
|            |          |   |        |       |       |
|            |          |   | 225.00 | 0.20  | 45.00 |
|            | BLR      | Receipt, review and analysis of email correspondence from Plaintiff's counsel re: "meet and confer" for motion for protective order                                       |        |       |       |

974184 Statement No:

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 225.00 | 0.50  | 112.50 |
| 05/31/2024 | PMB | Review and analysis of Motion for Protective Order and Leave to Proceed Pseudonymously,                             | 225.00 | 0.20  | 45.00  |
|            | PMB | Review and analysis of  | 225.00 | 0.30  | 67.50  |
|            | PMB | Review and analysis of [Proposed] Order Granting Motion for<br>Protective Order and Leave to Proceed Pseudonymously | 225.00 | 0.20  | 45.00  |
|            | РМВ | Review and analysis of  | 1      |       |        |
|            |     |   | 225.00 | 0.20  | 45.00  |
|            | PMB | Begin research to   |        |       |        |
|            | PMB | Research  | 225.00 | 0.40  | 90.00  |
|            |     |   | 225.00 | 0.30  | 67.50  |
|            | BLR | Receipt, review and analysis of Plaintiff's detailed motion for protective order/motion to proceed pseudonymously,  | 225.00 | 0.60  | 135.00 |
|            | BLR | Various email and telephone conferences among defense counsel re:   | 225.00 | 0.20  | 45.00  |
| E          | BLR | Receipt, review and analysis of State of Nevada Defendants' reply in support of motion to dismiss                   | 225.00 | 0.30  | 67.50  |
| 06/04/2024 | PMB | Brief supplemental research on  | 225.00 | 0.10  | 22.50  |
|            | РМВ | Continue preparation of   |        |       |        |
|            |     |   | 225.00 | 1.70  | 382.50 |
| 06/06/2024 | PMB |   |        |       |        |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Jasmine Sanchez

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Statement No:

974184

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

RATE HOURS 225.00 0.20 45.00 06/07/2024 PMB Conduct some supplemental research on 225.00 0.20 45.00 PMB after Atty Ryman's 225.00 0.20 45.00 BLR Work in 225.00 0.50 112.50 06/10/2024 Receipt, review and analysis of Mustang Ranch Defendants' Joinder BLR 225.00 0.10 22.50 06/11/2024 PMB Preparation of brief correspondence to Attorney Ryman 225.00 0.10 22.50 06/12/2024 Receipt, review and analysis of substantive opposition/joinder to BLR opposition to motion for protective order filed by Desert Rose Defendants, 225.00 45.00 0.20 BLR Receipt, review and analysis of State Defendants' joinder in response 225.00 0.10 22.50 06/13/2024 PMB Review and analysis of State Defendants' Joinder in County Defendant's Opposition to Motion for Protective Order 225.00 0.10 22.50 Review and analysis of Defendant Desert Rose Club's Joinder in Counties' Opposition to Motion for Protective Order 225.00 0.10 22.50 PMB Review and analysis of Western Best Defendants' Opposition to Plaintiff's Motion for a Protective Order And Leave to Proceed Pseudonymously 225.00 0.10 22.50 PMB Review and analysis of Declaration of Kenneth R. Green, filed as supportive evidence for Western Best's above Opposition to Motion for Protective Order 225.00 0.10 22.50 PMB Review and analysis of Chicken Ranch's Joinder in Counties' Opposition to Motion for Protective Order 225.00 0.10 22.50

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974184 Statement No:

|            | РМВ | Engage in series of email correspondence with counsel for Best Western Defendants re   | <u>RATE</u> | HOURS |       |
|------------|-----|--|-------------|-------|-------|
|            |     |  | 225.00      | 0.30  | 67.50 |
|            | BLR | Receipt, review and analysis of detailed opposition to motion for protective order filed by Chicken Ranch/Western Best Defendants,                           |             |       |       |
|            |     |  | 225.00      | 0.20  | 45.00 |
|            | BLR | Receipt, review and analysis of Errata filed by Western Best Defendants,   | 225.00      | 0.10  | 22.50 |
|            | BLR | Receipt, review and analysis of State Defendants' joinder to Western Best briefing   | 225.00      | 0.10  | 22.50 |
|            | BLR | Receipt, review and analysis of Plaintiff's detailed reply in support of motion for protective order (responding to County Defendants' opposition briefing), |             |       |       |
|            |     |  | 225.00      | 0.30  | 67.50 |
| 06/14/2024 | PMB | Review and analysis of Notice of Errata filed by Best Western<br>Defendants  | 225.00      | 0.10  | 22.50 |
|            | PMB | Preparation of correspondence to Atty Ryman  |             |       |       |
|            |     |  | 225.00      | 0.10  | 22.50 |
|            | PMB | Review and analysis of Joinder to Western Best Defendants' Opposition to Plaintiff's Motion for a Protective Order and Leave To Proceed Pseudonymously       | 225.00      | 0.10  | 22.50 |
| 06/17/2024 | РМВ | Review and analysis of   | 225.00      | 0.10  | 22.50 |
|            | РМВ | Research to  |             | 50    |       |
|            |     |  | 225.00      | 0.20  | 45.00 |
|            | PMB | Preparation of Motion for Leave of Court to Supplement Motion to   |             |       |       |

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974184 Statement No:

|            |     | Dismiss for Lack of Subject Matter Jurisdiction due to Lack of   | RATE   | <u>HOURS</u> |       |
|------------|-----|--|--------|--------------|-------|
|            |     | Standing   | 225.00 | 0.30         | 67.50 |
|            | РМВ | Review and analysis of Plaintiff's Reply in Support of Motion for<br>Protective Order                    | 225.00 | 0.10         | 22.50 |
|            | PMB | Review and analysis of correspondence from Atty Deanna Forbush, counsel for Chicken Ranch Defendants, re |        |              |       |
|            |     |  |        |              |       |
|            |     |  | 225.00 | 0.20         | 45.00 |
| 06/19/2024 | PMB | Preparation of   |        |              |       |
|            |     |  |        |              |       |
|            |     |  |        |              |       |
|            |     |  |        |              |       |
|            |     |  | 225.00 | 0.30         | 67.50 |
|            | PMB | Exchange series of email correspond. with Deanna Forbush, counsel for Chicken Ranch defendants,          |        |              |       |
|            |     |  | 225.00 | 0.10         | 22.50 |
|            | BLR | Revision and preparation of motion for leave of court to supplement motion to dismiss,                   |        |              |       |
|            |     |  | 225.00 | 0.30         | 67.50 |
| 06/20/2024 | PMB | Review and analysis of series of email communications from co-defense counsel Deanna Forbush             | 1      |              |       |
|            |     |  |        |              |       |
|            |     |  |        |              |       |
|            |     |  | 225.00 | 0.30         | 67.50 |
|            | PMB | Review and analysis of   |        |              |       |
|            |     |  |        |              |       |

Case 3:24-cv-00065-MMD-CSD Jasmine Sanchez

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Statement No: 974184

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

RATE HOURS 225.00 0.10 22.50 Receipt, review and analysis of Plaintiff's detailed response/reply re: motion for protective order, responding to Western Best Defendants' 225.00 0.20 45.00 arguments 06/21/2024 Review and analysis of Plaintiff's Reply against Western Best Defendants' Opposition to PI's Motion for Protective Order [ECF No. 0.20 45.00 225.00 PMB Telephone conference with Deanna Forbush, counsel for Western Best, re 225.00 0.10 22.50 PMB Review and analysis of 0.10 22.50 225.00 06/24/2024 PMB Review and analysis of 22.50 225.00 0.10 PMB Conduct very brief research to 225.00 0.10 22.50 Discuss with Attorney Ryman 225.00 0.00 Receipt, review and analysis of motion for judicial notice filed by State Defendants re: 225.00 0.20 45.00 Receipt, review and analysis of email communications from lobbyist BLR 225.00 0.10 22.50 06/25/2024 Review and analysis of correspondence from co-defense counsel for PMB the Chicken Ranch defendants, re:

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Page: 9 July 31, 2024

Statement No:

974184

|      |   | RATE   | HOURS |       |
|------|---|--------|-------|-------|
|      |   | 225.00 | 0.20  | 45.00 |
| PMB  | Perform a summary review of   |        |       |       |
|      |   | 225.00 | 0.20  | 45.00 |
| PMB  | Preparation of correspondence to Attorney Ryman   |        |       |       |
|      |   | 225.00 | 0.10  | 22.50 |
| PMB  | Review and analysis of correspondence from Attorney Ryman   | 225.00 | 0.10  | 22.50 |
| PMB  | Per instruction from Attorney Ryman,  |        |       |       |
|      |   |        | 2.42  |       |
| PMB  | Review and analysis of Verified Petition for Pro Hac Vice application                                 | 225.00 | 0.10  | 22.50 |
| , MD | forms for three separate attorneys of the National Center on Sexual Exploitation (ECF Nos. 87, 88, 89 |        |       |       |
|      |   | 225.00 | 0.20  | 45.00 |
| РМВ  | Detailed review and analysis of   |        |       |       |
|      |   | 225.00 | 0.10  | 22.50 |
| PMB  | Preparation of Opposition to Verified Petitions [ECF No. 90],   |        |       |       |
|      |   | 225.00 | 0.40  | 90.00 |
| PMB  | Assist with   |        |       |       |
|      |   | 225.00 | 0.20  | 45.00 |
| BLR  | Various email conferences among defense counsel re:   |        |       |       |
|      |   | 225.00 | 0.20  | 45.00 |
| BLR  | Receipt, review and analysis of series of motions for pro hac vice                                    | 220.00 | 0.20  | 10.00 |
|      | admission to District of Nevada from various National Center on Sexual Exploitation attorneys         |        |       |       |
|      |   | 225.00 | 0.30  | 67.50 |

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974184

Statement No:

|            | BLR | Detailed work   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 225.00 | 0.70  | 157.50 |
| 06/26/2024 | PMB | Review and analysis of State defendants' (Governor and Atty General) Joinder in County Defendants Opposition To Pro Hac Vice Petitions  | 225.00 | 0.10  | 22.50  |
| 4          | PMB | Review and analysis of Chicken Ranch Defendants Opposition to Plaintiff's Attorneys' Motion to Practice Pro Hac Vice (ECF No. 92), as well as detailed analysis of extensive exhibits (ECF Nos. 92-1, 92-2, and 92-3) | 225.00 | 0.20  | 45.00  |
|            | PMB | Conduct supplemental research to  |        |       |        |
|            |     |   | 225.00 | 0.20  | 45.00  |
|            | PMB | Preparation of correspondence to counsel for Chicken Ranch<br>Defendants (Atty Deanna Forbush)  |        |       |        |
|            |     |   | 225.00 |       | 0.00   |
|            | BLR | Receipt, review and analysis of State of Nevada Defendants' joinder to response to motions for pro hac vice admission   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of opposition to motions for pro hac vice admission filed by Western Best Defendants,  |        |       |        |
|            |     |   | 225.00 | 0.30  | 67.50  |
| 06/28/2024 | BLR | Receipt, review and analysis of Mustang Rang Defendants' joinder to opposition to motion for pro hac vice admission   | 225.00 | 0.10  | 22.50  |
| 07/02/2024 | PMB | Review and analysis of Motion to Amend, reflecting changes to Petition for Pro Hac Vice admission for Plaintiff's counsel Christen Price (ECF No. 94)   |        |       |        |
|            | PMB | Review and analysis of Motion to Amend, reflecting changes to   | 225.00 | 0.10  | 22.50  |
|            |     | Petition for Pro Hac Vice admission for Plaintiff's counsel Peter<br>Gentala (ECF No. 95)   | 225.00 | 0.10  | 22.50  |
|            | PMB | Exchange several email corresp. with counsel for Chicken Ranch defendants, Deanna Forbush, re   | 225.00 | 0.10  | 22.50  |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 71 of 131 Page: 11 July 31, 2024

Statement No: 974184

| ilisuic    | u. Store | ey County   |        |       |       |
|------------|----------|---|--------|-------|-------|
|            |          |   | RATE   | HOURS |       |
|            | BLR      | Receipt, review and analysis of corrected pro hac vice applications from NCOSE attornevs couched as motion for leave to amend.                |        |       |       |
|            |          |   | 225.00 | 0.20  | 45.00 |
|            | BLR      | Receipt, review and analysis of Plaintiff's combined reply in support of motions to permission for pro hac vice admission,                    |        |       |       |
|            |          |   | 225.00 | 0.30  | 67.50 |
|            | BLR      | Receipt, review and analysis of Plaintiff's combined response to motion for leave of court to supplement (re: USSC cert denial),              |        |       |       |
|            |          |   | 225.00 | 0.30  | 67.50 |
| 07/03/2024 | PMB      | Review and analysis of Plaintiff's combined response to State and County Defendants' Motion for Leave to Supplement Record (ECF Nos. 96 & 97) | 225.00 | 0.10  | 22.50 |
|            | PMB      | Review and analysis of Plaintiff's Reply in Support of Pro Hac Vice petitions (ECF No. 98)  | 225.00 | 0.10  | 22.50 |
|            | PMB      | Conference with Attornev Ryman re   |        |       |       |
|            |          |   | 225.00 |       | 0.00  |
| 07/09/2024 | BLR      | Receipt, review and analysis of State Defendants reply in support of motion to dismiss,   | 225.00 | 0.20  | 45.00 |
|            | BLR      | Work in   |        |       |       |
|            |          |   | 225.00 | 0.30  | 67.50 |
|            | BLR      | Receipt, review and analysis of State Defendants reply in support of motion for judicial notice,  | 225.00 | 0.20  | 45.00 |
| 07/10/2024 | PMB      | Review and analysis of State Defendants Reply in Support of Motion for Judicial Notice (ECF No. 99)   | 225.00 | 0.10  | 22.50 |
|            | PMB      | Research to   |        |       |       |
|            |          |   |        |       |       |

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Doe v. Storey County Statement No: 974184

Claim No.: P243-24-08998-01 Insured: Storey County

**Total Current Work** 

**Total Previous Billings** 

|            |     |   | RATE                     | HOURS        |          |
|------------|-----|---|--------------------------|--------------|----------|
|            |     |   | 225.00                   | 0.30         | 67.50    |
|            | РМВ | Preparation of  |                          |              |          |
|            |     |   | 225.00                   | 0.50         | 112.50   |
|            | BLR | Receipt, review and analysis of notice of docket corrections re: recent filing, review of filing from State Defendants re: same       | 225.00                   | 0.10         | 22.50    |
| 07/11/2024 | PMB | Review and analysis of  | 225.00                   | 0.10         | 22.50    |
|            | PMB | Preparation of correspondence to Attornev Ryman   |                          |              |          |
|            |     |   |                          |              |          |
|            |     |   |                          |              |          |
|            |     |   | 225.00                   | 0.10         | 22.50    |
|            | PMB | Receive back correspondence from Attorney Ryman   |                          |              |          |
|            |     |   | 225.00                   |              | 0.00     |
| 07/23/2024 | BLR | Receipt, review and analysis of notice of change of address from<br>Attorney General's office on behalf of state defendants           | 225.00                   | 0.10         | 22.50    |
| 07/25/2024 | BLR | Receipt, review and analysis of District Court's Order (minute order) denying motion to deny pro hac vice admission, consideration of |                          |              |          |
|            |     | objection   | 225.00                   | 0.10         | 22.50    |
|            | BLR | Receipt, review and analysis of Court's order denving (since-amended) pro hac vice admissions,  |                          |              |          |
|            |     |   |                          |              |          |
|            |     | For Current Services Rendered:  | 225.00                   | 0.20         | 45.00    |
|            |     | Recapitulation  |                          | 29.80        | 6,705.00 |
|            |     | nekeeper Hours F  |                          | TAL          |          |
|            |     |   | 5.00 \$2,67<br>5.00 4,02 | 7.50<br>7.50 |          |
|            |     |   |                          |              |          |

6,705.00

\$16,762.50

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 73 of 131 Page: 13

Jasmine Sanchez Page: 13

July 31, 2024

Statement No: 974184

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

### **Payments**

 07/03/2024
 Payment - Nevada POOL
 -16,695.00

 07/03/2024
 Payment - write downs Invoice #973462
 -67.50

-10,702.50

Balance Due \$6,705.00

Please Remit \$6,705.00



MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

#### ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### **INVOICE 09-29-24-BLR**

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

09/29/2024 Statement Date:

974229 Statement No. Account No. 25.47851

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

> For all legal services rendered and costs advanced régarding the above-referenced matter.

### **FEES**

| 07/29/2024 | BLR | Receipt, review and analysis of detailed motion to intervene as<br>Defendant filed by A Safer Nevada political action committee, | RATE   | <u>HOURS</u>   |       |
|------------|-----|--|--------|----------------|-------|
|            |     |  | 225.00 | 0.30           | 67.50 |
| 08/07/2024 | BLR | Review and analysis of notices of refiling for motion to intervene and appearances related to Russel Greer's motion to intervene | 225.00 | 0.10           | 22.50 |
| 08/12/2024 | РМВ | Review and analysis Plaintiff's Opposition to Mr. Greer's Motion to Intervene (ECF No. 111, consisting of 11 pages)              | 225.00 | 0.20           | 45.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's response to motion for   |        |                |       |
|            |     | intervenor by Russell Greer,   | 225.00 | 0.20           | 45.00 |
| 08/16/2024 | РМВ | Review and analysis of Order of August 16, 2024, dismissing all claims against County Defendants with prejudice                  | 225.00 | 0.30<br>Page 1 | 67.50 |

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Doe v. Storey County Claim No.: P243-24-08998-01 Insured: Storey County

Statement No: 974229

|            |      |   | RATE   | HOURS |        |
|------------|------|---|--------|-------|--------|
|            | BLR  | Preparation of detailed email to clients and claims representatives re:   | 225.00 | 0.30  | 67.50  |
|            | BLR  | Receipt, review and analysis of detailed order granting motion to dismiss for lack of subject matter jurisdiction,                      | 225.00 | 0.30  | 67.50  |
|            | BLR  | Research  |        |       |        |
| 08/20/2024 | BLR  | Email conferences with Attorney General's office re:  | 225.00 | 0.50  | 112.50 |
| 00/20/2024 | DLIX | Email conferences with Attorney General's Office re.  | 225.00 | 0.10  | 22.50  |
|            | BLR  | Research  | 225.00 | 0.50  | 112.50 |
| 08/21/2024 | BLR  | Additional email conferences among public entity defense counsel re   | 225.00 | 0.10  | 22.50  |
| 08/29/2024 | BLR  | Receipt, review and analysis of Plaintiff's motion for entry of default against Hacienda Defendant, along with accompanying declaration | 225.00 | 0.10  | 22.50  |
|            | BLR  | Continue research re:   | 225.00 | 0.70  | 157.50 |
| 08/30/2024 | BLR  | Receipt, review and analysis of Plaintiff's detailed response to court's order to show cause re: claims against brothel defendants,     |        |       |        |
|            |      |   | 225.00 | 0.30  | 67.50  |
|            | BLR  | Research re:  |        |       |        |
| 09/03/2024 | BLR  | Various telephone conferences among counsel re:   | 225.00 | 1.10  | 247.50 |
| 00/00/2024 | DLIK | various telephone somerences among counselve.   | 225.00 | 0.20  | 45.00  |
| 09/04/2024 | PMB  | Research to   | 225.00 | 0.80  | 180.00 |
|            | PMB  | Research for  |        |       |        |
|            |      |   | 225.00 | 0.70  | 157.50 |
|            | PMB  | Review and analysis of  |        |       |        |

Doe v. Storey County Claim No.: P243-24-08998-01

Insured: Storey County

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Statement No:

974229

| ilisule    | J. Slore | ey County   |        |       |        |
|------------|----------|---|--------|-------|--------|
|            |          |   | RATE   | HOURS |        |
|            |          |   | 225.00 | 0.40  | 90.00  |
|            | BLR      | Preparation of detailed email report to all clients re:                                   | 225.00 | 0.30  | 67.50  |
| 09/05/2024 | РМВ      | Review and analysis of Plaintiff's Response to Court's Order to Show Cause (ECF No. 112), |        |       |        |
|            | DMD      | Poview and analysis of  | 225.00 | 0.10  | 22.50  |
|            | PMB      | Review and analysis of  |        |       | ·      |
|            | РМВ      | Begin preparation of  | 225.00 | 0.30  | 67.50  |
|            |          |   | 225.00 | 1.50  | 337.50 |
|            | PMB      | Revisit   | 225.00 | 0.10  | 22.50  |
|            | РМВ      | Preparation of  |        |       |        |
| 09/06/2024 | PMB      | Continue working  | 225.00 | 0.10  | 22.50  |
|            |          |   | 225.00 | 0.40  | 90.00  |
|            | PMB      | Prepare   |        |       |        |
|            |          |   | 225.00 | 1.20  | 270.00 |
|            | PMB      | Prepare   |        |       |        |

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Filed 02/28/25

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Statement No:

974229

|            | 1   |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 225.00 | 1.20  | 270.00 |
|            | РМВ | Preparation of  |        |       |        |
|            |     |   |        |       |        |
|            |     |   | 225.00 | 0.30  | 67.50  |
|            | PMB | Preparation of  | 225.00 | 0.10  | 22.50  |
|            | BLR | Email conferences among counsel re:   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of pro hac vice petition filed by attorney<br>Benjamin Bull                          | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of pro hac vice petition filed by Danielle Pinter, consideration of response to same | 225.00 | 0.10  | 22.50  |
| 09/08/2024 | PMB | Revise and edit   | 225.00 | 0.80  | 180.00 |
| 09/09/2024 | PMB | After Attorney Ryman  |        |       |        |
|            |     |   | 225.00 | 0.20  | 45.00  |
|            | BLR | Receipt, review and analysis of District Court's orders granting motions for permission to practice pro hac vice, | 225.00 | 0.10  | 22.50  |
|            | BLR | Detailed work   |        |       |        |
|            |     |   | 225.00 | 2.40  | 540.00 |
| 09/10/2024 | PMB | Review and analysis of Proposed Defendant Intervenor's Request for Judicial Notice                                |        |       |        |
|            | ļ   | 101 Judiciai Notice   | 225.00 | 0.10  | 22.50  |
|            | PMB | Review and analysis of  |        |       |        |
|            |     |   | 225.00 | 0.10  | 22.50  |
|            | PMB | Preparation of brief email to Attorney Ryman  |        |       |        |
|            | ĺ   |   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of intervenor Russell Greer's "request for judicial notice"                          |        |       |        |

Statement No:

974229

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

RATE HOURS 0.30 67.50 225.00 Preparation of email report to all clients re: 225.00 0.30 67.50 09/12/2024 Review and analysis of Clerks Entry of Default against Hacienda PMB 225.00 0.10 22:50 Rooming House Review and analysis of Mustang Ranch's Response to Plaintiff's PMB Response to Order To Show Cause [ECF NO. 115] 0.20 45.00 225.00 Receipt, review and analysis of Clerk's entry of default against BLR 22.50 brothel Defendant Hacienda Rooming House 225.00 0.10 Receipt, review and analysis of detailed response/opposition to Plaintiff's response to order to show cause, as allowed by Judge Du's Order, from Mustang Defendants, 45.00 225.00 0.20 Receipt, review and analysis of detailed response to Plaintiff's brief 09/13/2024 BLR re: OSC order filed by Desert Rose Club brothel Defendants, consideration of same 225.00 0.20 45.00 Review and analysis of Joinder of State Defendants in County 09/16/2024 PMB Defendants' Motion for Rule 54(b) Cert. (ECF No. 130) 225.00 0.10 22.50 Review and analysis of Hacienda Room's Notice of Unavailability PMB and Request for Continuance (ECF No. 129) 225.00 0.10 22.50 Review and analysis of Hacienda's Joinder in Brothel Defendant's Response to Plaintiff's Response to Order to Show Cause (ECF No. 22.50 225.00 0.10 128) PMB Review and analysis of Hacienda's Response to Plaintiff's Response 225.00 0.10 22.50 to Order to Show Cause (ECF No. 127) PMB Review and analysis of Hacienda's Response to Request for Default 22.50 225.00 0.10 Review and analysis of Notice of Appearance for Counsel of PMB 0.10 22.50 225.00 Hacienda Room (ECF No. 125) Receipt, review and analysis of notice of appearance of counsel for

Case 3:24-cv-00065-MMD-CSD Document 160-1 Jasmine Sanchez Page 79 of 131 Page: 6 September 29, 2024 Page: 6 Filed 02/28/25

974229

Statement No:

Doe v. Storey County

Claim No.: P243-24-08998-01

Insured: Storey County

|            |      | Defendant Hacienda Rooming house (defaulted)  |                   |                        | <u>RATE</u> 225.00     | HOURS<br>0.10        | 22.50 |
|------------|------|---|-------------------|------------------------|------------------------|----------------------|-------|
|            | BLR  | Receipt, review and analysis of Defendant Hacienda<br>House response to motion for entry of default judgm       |                   |                        |                        |                      |       |
|            |      |   |                   |                        | 225.00                 | 0.20                 | 45.00 |
|            | BLR  | Receipt, review and analysis of Defendant Hacienda House response to Order to Show Cause                        | Rooming           |                        | 225.00                 | 0.10                 | 22.50 |
|            | BLR  | Receipt, review and analysis of Defendant Hacienda House ioinder in previous filings.                           | Rooming           |                        | 225.00                 | 0.10                 | 22.50 |
|            | BLR  | Receipt, review and analysis of motion to continue de Hacienda Rooming House attorney                           | eadlines filed by |                        | 225.00                 | 0.10                 | 22.50 |
|            | BLR  | Receipt, review and analysis of State Defendants' joi<br>Defendants' motion for certification of final judgment |                   |                        | 225.00                 | 0.10                 | 22.50 |
| 09/18/2024 | BLR  | Email and telephone conferences with co-defense co  | ounsel re:        |                        | 225.00                 | 0.20                 | 45.00 |
|            | BLR  | Receipt, review and analysis of notice of hearing in re<br>email conferences with claims representative re:     | elated matter.    |                        | 225.00                 | 0.20                 | 45.00 |
| 09/23/2024 | PMB  | Review and analysis of Plaintiff's Opposition to Coun<br>Motion for Certification and Entry of Final Judgment ( |                   |                        | 225.00                 | 0.10                 | 22.50 |
|            | BLR  | Receipt, review and analysis of Plaintiff's opposition to certification of final judgment.                      | o motion for      |                        | 225.00                 | 0.20                 | 45.00 |
|            | BLR  | Email conference with counsel for Hacienda Ranch re   | e:                | -                      | 225.00                 | 0.20                 | 45.00 |
| 00/04/0004 | DI D |   |                   | 2                      | 225.00                 | 0.10                 | 22.50 |
| 09/24/2024 | BLR  | Receipt, review and analysis of Plaintiff's detailed res request for judicial notice filed by Russell Greer,    | ponse to          |                        |                        |                      |       |
|            |      | For Current Services Rendered:  |                   | 2                      | 225.00                 | $\frac{0.20}{20.60}$ | 45.00 |
|            |      | Recapitulation  |                   |                        |                        |                      |       |
|            | Bre  | nt L. Ryman   |                   | Rate<br>25.00<br>25.00 | TO<br>\$2,385<br>2,250 |                      |       |

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Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

Total Current Work 4,635.00

974229

Statement No:

Total Previous Billings \$6,705.00

Balance Due \$11,340.00

Please Remit \$11,340.00

# **ERICKSON, THORPE&** SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

# **INVOICE 11-30-24-BLR**

Statement Date:

11/30/2024 974695

Statement No. Account No.

25.47851

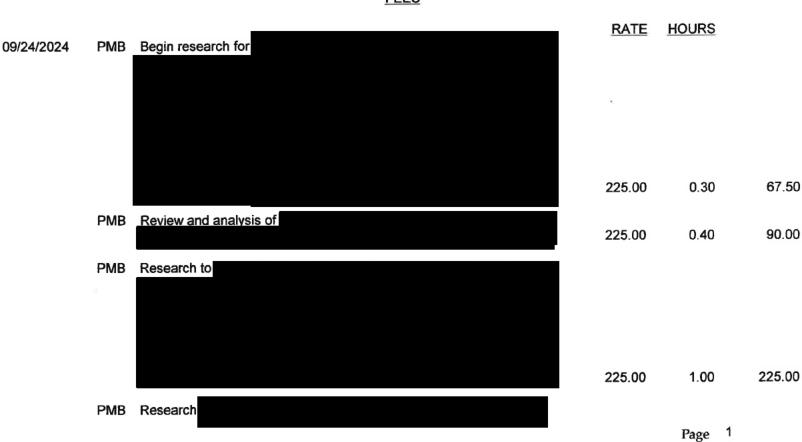
Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**



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Statement No:

974695

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County



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Jasmine Sanchez

Filed 02/28/25

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Page: 3

Statement No:

974695

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     |   | 225.00 | 0.70  | 157.50 |
| 09/27/2024 | BLR | Receipt, review and analysis of State Defendants' Joinder to reply in support of motion for final judgment certification  | 225.00 | 0.10  | 22.50  |
|            | BLR | Detailed work in  |        |       |        |
|            |     |   | 225.00 | 0.70  | 157.50 |
|            | BLR | Detailed work in  |        |       |        |
|            |     |   | 225.00 | 0.70  | 157.50 |
|            | BLR | Preparation of email reports to each set of clients, claims representatives and/or county representatives, various email  |        |       |        |
|            |     | conferences in response to same   | 225.00 | 0.20  | 45.00  |
|            | BLR | Work in   |        |       |        |
|            |     |   | 225.00 | 1.50  | 337.50 |
|            | РМВ | Assist with   | 225.00 | 0.50  | 112.50 |
|            | PMB | Review and revise Reply in Support of Motion to Certify Final<br>Judgment to final form                                   | 225.00 | 0.70  | 157.50 |
| 09/30/2024 | BLR | Receipt, review and analysis of Court's order denying Hacienda<br>Defendants' request for extension                       | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Plaintiff's combined motion to strike Hacienda Defendants' response to motion for default |        |       |        |
|            |     |   | 225.00 | 0.20  | 45.00  |
|            | PMB | Begin research on   |        |       |        |
|            |     |   | 225.00 | 0.10  | 22.50  |
| 10/01/2024 | BLR | Email conferences with counsel for Hacienda Defendants re:  | 225.00 | 0.10  | 22 50  |
|            | ~   |   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Western Best Defendants joinder to order to show cause briefing and/or response           | 225.00 | 0.10  | 22.50  |
|            | PMB | Continue with research  |        | **    |        |
|            |     |   | 225.00 | 1.30  | 292.50 |
|            |     |   |        |       |        |

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974695

Statement No:

|             |              | •   |        |              |        |
|-------------|--------------|---|--------|--------------|--------|
| 10/02/2024  | BLR          | Review and analysis of  | RATE   | <u>HOURS</u> |        |
|             |              |   | 225.00 | 0.90         | 202.50 |
|             | BLR          | Travel from Reno office to Las Vegas federal court via air and car for hearing on pseudonym   | 112.50 | 1.10         | 123.75 |
|             | BLR          | Return travel from Las Vegas federal court to Reno office, via air and car, following hearing | 112.50 | 1.20         | 135.00 |
|             | РМВ          | Continue research   |        |              |        |
|             |              |   |        | .1           |        |
|             | 2140         |   | 225.00 | 1.50         | 337.50 |
| 10/03/2024  | PMB          | Continue research   |        |              |        |
|             |              |   |        |              |        |
| -           |              |   | 225.00 | 0.30         | 67.50  |
|             | BLR          | Email conferences with counsel for Hacienda Defendants re:                                    | 225.00 | 0.10         | 22.50  |
| 10/04/2024  | BLR          | Email conference with counsel for SHAC LLC re:  | 225.00 | 0.10         | 22.50  |
| 10/07/2024  | PMB          | Begin preparation of  |        |              |        |
| 10/08/2024  | BLR          | Receipt, review and analysis of   | 225.00 | 0.30         | 67.50  |
| 10/00/202-1 | <b>D</b> L., | Robolpt, Teston and analysis st   | 225.00 | 0.20         | 45.00  |
|             | РМВ          | Conclude memorandum re  | 225.00 | 1.00         | 225.00 |
| 10/09/2024  | BLR          | Receipt, review and analysis of proposed intervenor's motion for                              | 225.00 | 1.00         | 220.00 |
| 10/03/2027  | DLIX         | hearing,  | 225.00 | 0.10         | 22.50  |
| 10/11/2024  | BLR          | Preparation of email reports re   |        |              |        |

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Statement No:

974695

|            |     |   | <u>RATE</u> 225.00 | HOURS<br>0.10 | 22.50          |
|------------|-----|---|--------------------|---------------|----------------|
| 10/14/2024 | BLR | Receipt, review and analysis of opposition by Bella's defendants re:<br>Motion to strike filed by Plaintiff | 225.00             | 0.10          | 22.50          |
| 10/18/2024 | BLR | Receipt, review and analysis of District Court's detailed order addressing various pending motions,         | 225.00             | 0.30          | 67.50          |
| 10/21/2024 | РМВ | Review and analysis of Order [ECF No. 141]  | 225.00             | 0.20          | 45.00          |
|            | РМВ | Telephone conference with Deanna Forbush (counsel for one of brothels)                                      |                    |               |                |
| je         | РМВ | Preparation of brief correspondence to Attorney Forbush,  | 225.00             | 0.20          | 45.00          |
|            | BLR | Receipt, review and analysis of email correspondence from proposed intervenor Russell Greer re:             | 225.00             | 0.10          | 22.50          |
|            | BLR | Preparation of email report to counsel re:  | 225.00             | 0.10          | 22.50          |
| 10/22/2024 | BLR | Email conferences with representative of private defendants re:   | 225.00<br>225.00   | 0.10          | 22.50<br>22.50 |
|            | BLR | Preparation of detailed email report to clients and claims representative re:                               | 225.00             | 0.30          | 67.50          |
| 10/23/2024 | РМВ | Review and analysis of  | 220.00             | 0.00          | 01.00          |

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974695

Statement No:

|             | 1    |   | RATE   | HOURS |       |
|-------------|------|---|--------|-------|-------|
|             |      |   | 225.00 | 0.10  | 22.50 |
|             | PMB  | Review and analysis of Plaintiff's Response in Opposition to<br>Proposed Intervenor's Motion for Hearing/Oral Argument and Motion<br>to Strike (ECF Nos. 142&143) | 225.00 | 0.20  | 45.00 |
|             | BLR  | Receipt, review and analysis of Plaintiff's response to Russell Greer motions, also filed as motion to strike,  | 225.00 | 0.20  | 45.00 |
| 10/28/2024  | PMB  | Review and analysis of  |        |       |       |
|             |      |   |        |       |       |
|             |      |   |        |       |       |
|             |      |   | 225.00 | 0.10  | 22.50 |
|             | BLR  | Receipt, review and analysis of Russell Greer reply in support of request for oral argument   | 225.00 | 0.10  | 22.50 |
|             | BLR  | Receipt, review and analysis of   |        |       |       |
|             |      |   | 225.00 | 0.30  | 67.50 |
|             | BLR  | Receipt, review and analysis of   |        |       |       |
|             |      |   | 225.00 | 0.30  | 67.50 |
| 11/01/2024  | BLR  | Receipt, review and analysis of Plaintiff's detailed motion for reconsideration of order  |        |       |       |
| 11/04/2024  | BLR  | Receipt, review and analysis of detailed response to motion to strike   | 225.00 | 0.30  | 67.50 |
| 1 1/0 1/202 | 52.1 | filed by Plaintiffs   | 225.00 | 0.20  | 45.00 |
|             | BLR  | Receipt, review and analysis of proposed intervenor's detailed response to motion for reconsideration, as well as separately-filed motion for judicial notice,    | 225.00 | 0.20  | 45.00 |

| Cla        | e v. Storey<br>im No.: P2<br>ured: Store | 43-24-08998-01   | o.c.         |                                 | 07.1000           |
|------------|--|--|--------------|---------------------------------|-------------------|
| 11/11/2024 | BLR                                      | Receipt, review and analysis of Plaintiff's motion to strike documents   | RATE         | HOURS                           |                   |
| 11/11/2024 | , BEN                                    | filed by Russell Greer,  | 225.00       | 0.10                            | 22.50             |
| 11/12/2024 | PMB                                      | Review and analysis of   | 225.00       |                                 | 0.00              |
| 11/14/2024 | PMB                                      | Review and analysis of Defendant Chicken Ranch's Opposition to Motion for Reconsideration (ECF No. 148) of Order   | 223.00       |                                 | 0.00              |
|            |  |  | 225.00       | 0.10                            | 22.50             |
| 11/15/2024 | PMB                                      | Review Desert Rose's Motions for Sanctions Pursuant to Rule 11 against plaintiff (.1)(n/c)   | 225.00       |                                 | 0.00              |
|            | BLR                                      | Receipt, review and analysis of Western Best response to motion for reconsideration,   | 225.00       | 0.20                            | 45.00             |
| 11/20/2024 | РМВ                                      | Exchange series of correspondence with Attorney Deanna Forbush (brothel counsel) re  | 225.00       | 0.10                            | 22.50             |
|            | РМВ                                      | Exchange series of correspondence with Attorney Deanna Forbush (brothel counsel) re  | 225.00       | 0.10                            | 22.50             |
| 11/21/2024 | BLR                                      | Receipt, review and analysis of Plaintiff's combined reply in support of motion for reconsideration,   | 225.00       | 0.20                            | 45.00             |
|            | BLR                                      | Receipt, review and analysis of  |              |                                 |                   |
|            |  |  | 225.00       | 0.20                            | 45.00             |
| 11/23/2024 | BLR                                      | Preparation of detailed email report re:   |              |                                 |                   |
|            |  |  | 225.00       | 0.30                            | 67.50             |
| 11/27/2024 | BLR                                      | Receipt, review and analysis of Plaintiff's detailed opposition/reply to Rule 11 motion filed by Desert Rose club, For Current Services Rendered:  | 225.00       | 0.20<br>28.50                   | 45.00<br>6,153.75 |
|            |  | Recapitulation   |              |                                 |                   |
|            | Bre<br>Bre                               | nekeeper         Hours         Rate           ent L. Ryman         2.30         \$112.50           ent L. Ryman         9.00         225.00           ul M. Bertone         17.20         225.00 | \$25<br>2,02 | DTAL<br>58.75<br>25.00<br>70.00 |                   |

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Statement No: 974695

\$6,331.14

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

Please Remit

## Expenses

| 10/02/2024 | Travel expense - Southwest Airlines           | 119.99            |
|------------|---|-------------------|
| 10/02/2024 | Travel expense - fuel                         | 2.69              |
| 10/02/2024 | Travel expense - parking                      | 1.33              |
| 10/02/2024 | Travel expense - Reno Tahoe Airport (parking) | 12.00             |
| 10/02/2024 | Travel expense -Hertz Car Rental              | 41.38             |
|            | Total Expenses                                | 177.39            |
|            | Total Current Work                            | 6,331.14          |
|            | Total Previous Billings                       | \$11,340.00       |
|            | Payments                                      |                   |
| 10/28/2024 | Payment - Nevada POOL                         | -4,635.00         |
| 10/28/2024 | Payment - Nevada POOL                         | -6,705.00         |
|            | Total Payments                                | -11,340.00        |
|            | Balance Due                                   | <u>\$6,331.14</u> |
|            |   |                   |



MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

**INVOICE 01-31-25-BLR** 

Statement Date: Statement No. Account No. 01/31/2025 974714 25.47851

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

Doe v. Storey County

Claim No.: P243-24-08998-01 Insured: Storey County

> For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**

| 12/02/2024 | BLR   | Receipt, review and analysis of |   | RATE   | <u>HOURS</u> |       |
|------------|-------|---------------------------------|---|--------|--------------|-------|
| 12/03/2024 | РМВ   | Review and analysis of          |   | 225.00 | 0.20         | 45.00 |
| 12/03/2024 | PIVID | Review and analysis of          |   |        |              |       |
|            | РМВ   | Review and analysis of          | I | 225.00 | 0.10         | 22.50 |
|            |       |                                 |   |        |              |       |
|            |       |                                 | ú | 225.00 | 0.10         | 22.50 |

Page: 2 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 90 of 131 January 31, 2025 Jasmine Sanchez 974714 Statement No: Doe v. Storey County Claim No.: P243-24-08998-01 Insured: Storey County RATE HOURS Receipt, review and analysis of Desert Rose Club's reply in support 12/04/2024 BLR 22.50 of motion for sanctions 225.00 0.10 Receipt, review and analysis of email from proposed intervenor 12/06/2024 BLR Russell Greer to all counsel re: 225.00 0.20 45.00 Receipt, review and analysis of affidavit of filed Russell Greer, 12/09/2024 BLR 0.10 22.50 225.00 PMB Conduct research on Attorney Ryman's 12/17/2024 67.50 0.30 225.00 Review and analysis of 01/16/2025 225.00 0.10 22.50 Receipt, review and 01/23/2025 BLR 22.50 225.00 0.10 1.30 292.50 For Current Services Rendered: Recapitulation TOTAL Timekeeper <u>Hours</u> Rate \$180.00 Brent L. Ryman 0.80 \$225.00 112 50 0.50 225 00

| Paul M. Bertone         | 0.50 | 223.00 | 112.50 |            |
|-------------------------|------|--------|--------|------------|
| Total Current Work      |      |        |        | 292.50     |
| Total Previous Billings |      |        |        | \$6,331.14 |
|                         |      |        |        |            |

**Balance Due** 

Please Remit

\$6,623.64

\$6,623.64

# ERICKSON, THORPE & SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### **INVOICE 04-30-24-BLR**

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509 Statement Date: 04/30/2024

Statement No. 973453 Account No. 973450

Doe v. Elko County

Claim No.: P243-24-08998-02

insured: Elko County

For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**

| 02/15/2024 | BLR | Detailed telephone conference with Courtney Sweet, attorney for defendant brothel and owner, re-                                     | RATE   | HOURS |        |
|------------|-----|--|--------|-------|--------|
|            |     |  | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and detailed analysis of lengthy complaint and related media articles, consideration of                              |        |       |        |
|            |     |  | 225.00 | 0.50  | 112.50 |
|            | BLR | Receipt, review and analysis of notice of judicial assignment and consideration of same, various email conferences among clients re: |        |       |        |
|            |     |  | 225.00 | 0.20  | 45.00  |
|            | BLR | Receipt, review and analysis of filed summonses, consideration of  |        |       |        |
|            |     |  | 225.00 | 0.10  | 22.50  |
| 02/16/2024 | PMB | Conduct minor supplemental research on   |        |       |        |
|            |     | also examine   |        |       |        |
|            |     |  |        |       |        |
|            |     |  | 005.00 | 0.40  | 00.00  |
|            |     |  | 225.00 | 0.40  | 90.00  |

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April 30, 2024

Statement No:

|            | PMB  | Begin preparation of Motion to Dismiss  | RATE             | HOURS |                |
|------------|------|---|------------------|-------|----------------|
| 00/40/2004 | DMD  |   | 225.00           | 1.10  | 247.50         |
| 02/19/2024 | PMB  | Continue drafting   | 225.00           | 0.60  | 135.00         |
|            | PMB  | Continue supplemental research:   |                  |       |                |
|            |      |   | 225.00           | 0.10  | 22.50          |
| 02/20/2024 | PMB  | Continue preparation of arguments for motion to dismiss for                         | 225.00           | 1.50  | 337.50         |
|            | BLR  | Preparation of email report to client representatives and claims representative re: | 225.00           | 0.20  |                |
| 02/21/2024 | РМВ  | Continue preparation of argument in support of motion to dismiss,                   | 225.00<br>225.00 | 0.30  | 67.50<br>67.50 |
| 02/22/2024 | PMB  | Continue preparation of (for Motion to Dismiss)                                     |                  |       | 01.00          |
|            | BLR  | Work in preparation of motion to dismiss  | 225.00           | 0.90  | 202.50         |
| 02/23/2024 | DI D | Detailed work in proposition of an inches   | 225.00           | 0.80  | 180.00         |
| 02/23/2024 | BLR  | Detailed work in preparation of motion to dismiss                                   | 225.00           | 1.20  | 270.00         |
|            | РМВ  | Conduct some minor supplemental research  |                  |       |                |
|            |      |   |                  |       |                |
|            |      |   | 225.00           | 0.40  | 90.00          |
|            | PMB  | Work in these new materials to Motion to Dismiss                                    |                  |       |                |
| 02/24/2024 | BLR  | Preparation of detailed email to clients re:  | 225.00           | 0.80  | 180.00         |
|            |      |   | 225.00           | 0.30  | 67.50          |
|            |      |   | *                |       |                |

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Statement No:

|            | BLR  |   | RATE   | HOURS |        |
|------------|------|---|--------|-------|--------|
|            |      | matter jurisdiction based on improper use of pseudonym, including   | 225.00 | 2.10  | 472.50 |
| 02/26/2024 | BLR  | Various email conferences among clients re:   | 225.00 | 0.10  | 22.50  |
| 02/27/2024 | РМВ  | Begin research on Opposition to pro hac vice applications   |        |       |        |
|            | I    | and also examining  |        |       |        |
| 02/28/2024 | PMB  | Continue with research  | 225.00 | 1.00  | 225.00 |
| 0212012024 | TIME | Continue with research  | 225.00 | 1.00  | 225.00 |
|            | РМВ  | also examine  | 220.00 |       | 220.00 |
|            |      |   | 225.00 | 1.00  | 225.00 |
| 02/29/2024 | PMB  | Continue research on  | 225.00 | 0.30  | 67.50  |
|            | PMB  | Review and analysis of Motion to Dismiss for Violation of FRCP 8(a), or in the Alternative, Motion to Strike for Violation of FRCP 12(f), filed by counsel for Mustang Ranch and Gilman | 225.00 | 0.10  | 22.50  |
|            | PMB  | Begin preparation of Motion to Deny Pro Hac Vice Admission to Practice to All National Center on Sexual Exploitation Attorneys Listed on Complaint (ECF No. 1).                         | 225.00 | 0.20  | 45.00  |
|            | BLR  | Receipt, review and analysis of Court's detailed order re: case management conference and joint case management statement, notes to file re:  | 225.00 | 0.10  | 22.50  |
|            | BLR  | Receipt, review and analysis of Magistrate Judge Baldwin standing order, notes to file re:  | 225.00 | 0.10  | 22.50  |
|            | BLR  | Receipt, review and analysis of Mustang Ranch Defendants joinder to motion to dismiss   | 225.00 | 0.10  | 22.50  |
|            |      |   |        |       |        |

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|             |              |   | RATE   | HOURS |        |
|-------------|--------------|---|--------|-------|--------|
|             | BLR          | Receipt, review and analysis of Mustang Ranch Defendant's required disclosure/certificate of interested parties | 225.00 | 0.10  | 22.50  |
|             | BLR          | Receipt, review and analysis of Mustang Ranch Defendants' Motion to Dismiss,                                    |        |       |        |
| 03/01/2024  | РМВ          | Continue preparation of Motion to Deny Pro Hac Vice Admission,  | 225.00 | 0.30  | 67.50  |
|             |              |   |        |       |        |
|             |              | also draft a brief  |        |       |        |
|             |              |   |        |       |        |
|             | BLR          | Preparation of motion to deny pro hac vice admission,   | 225.00 | 2.10  | 472.50 |
|             | <b>D</b> LIX | reparation of motion to doily pro nad vise damics on,   | 225.00 | 1.20  | 270.00 |
|             | BLR          | Preparation of certificate of interested parties as required by rules   | 225.00 | 0.10  | 22.50  |
|             | BLR          | Preparation of email report to clients and claims representative re:  |        |       |        |
| 03/04/2024  | PMB          | Begin initial preparation for Motion to Dismiss complaint   | 225.00 | 0.20  | 45.00  |
|             |              |   |        |       |        |
|             |              |   |        |       |        |
| 02/05/2024  | DMD          | Continue with review and englysis of  | 225.00 | 0.40  | 90.00  |
| 03/05/2024  | PMB          | Continue with review and analysis of  |        |       |        |
|             |              |   |        |       |        |
| 00/07/000 4 | D145         | Continue  | 225.00 | 0.40  | 90.00  |
| 03/07/2024  | PMB          | Continue  |        |       |        |
|             |              |   | 225.00 | 0.30  | 67.50  |
|             |              |   |        |       |        |

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| 03/11/2024 | PMB | Continue review and analysis of  | RATE   | <u>HOURS</u> |        |
|------------|-----|--|--------|--------------|--------|
|            |     |  | 225.00 | 0.50         | 112.50 |
|            | PMB | Begin conducting research to   | 225.00 | 0.30         | 67.50  |
|            | BLR | Receipt, review and preliminary analysis of Plaintiff's opposition to motion to dismiss for improper use of pseudonym, consideration of  | 225.00 | 0.40         | 90.00  |
| 03/12/2024 | PMB | Review and analysis of Opposition to Nye County, Elko County and Storey County's (including Leonard "Lance" Gilman in his Official Capacity) Motion to Dismiss for Improper Use of Pseudonym Resulting in Lack of Subject Matter Jurisdiction, | 225.00 | 0.00         | 45.00  |
| 03/13/2024 | РМВ | Research to  | 225.00 | 0.20         | 45.00  |
|            |     | as well as research  |        |              |        |
|            | PMB | Conduct research   | 225.00 | 1.60         | 360.00 |
|            |     |  | 225.00 | 0.30         | 67.50  |
| 03/14/2024 | РМВ | Preparation of Reply arguments in support of Motion to Dismiss for   |        |              |        |
|            |     |  | 225.00 | 2.00         | 450.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's detailed opposition to motion to dismiss filed by Brothel Defendants, consideration of   | 225.00 | 0.40         | 90.00  |
| 03/15/2024 | РМВ | Complete writing first draft of reply,   | ,      | 0.40         | 50.00  |
|            |     |  | 225.00 | 1.50         | 337.50 |
|            | BLR | Receipt, review and preliminary analysis of opposition to motion to deny pro hac vice applications filed by Plaintiff's counsel, consideration of  |        |              |        |

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Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |   | <u>RATE</u> 225.00 | HOURS<br>0.50 | 112.50 |
|------------|-----|---|--------------------|---------------|--------|
| 03/18/2024 | РМВ | Conduct minor research on   |                    |               |        |
|            |     |   | 225.00             | 0.10          | 22.50  |
|            | PMB | Review  | 225.00             | 0.10          | 22.50  |
|            | PMB | Review and revise   | 225.00             | 0.60          | 135.00 |
|            | PMB | After Attorney Ryman has  |                    |               |        |
|            |     |   | 225.00             | 0.20          | 45.00  |
|            | PMB | Review and analysis of Opposition to Motion to Deny Pro Hac Vice Admission,   | 225.00             | 0.50          | 112.50 |
|            | PMB | Begin research for Reply in support of Motion to Deny Pro Hac Vice Application  | 225.00             | 0.20          | 45.00  |
|            | BLR | Complete preparation of reply in support of motion to dismiss for improper use of pseudonym, including  |                    |               |        |
|            |     |   | 225.00             | 1.50          | 337.50 |
| 03/19/2024 | BLR | Receipt, review and analysis of Mustang Ranch Defendants' Joinder to reply briefing in support of motion to dismiss for improper use of pseudonym | 225.00             | 0.10          | 22.50  |
| 03/20/2024 | РМВ | Continue with research on   |                    |               |        |
|            |     |   |                    |               |        |
|            |     |   | 225.00             | 0.50          | 112.50 |
|            | PMB | Also research   |                    |               |        |
|            |     |   | 225.00             | 0.20          | 45.00  |
|            | PMB | Continue drafting Reply,  |                    |               |        |
|            |     |   | 225.00             | 2.00          | 450.00 |
|            | PMB | Preparation of  | 225.00             | 0.10          | 22.50  |
| 03/21/2024 | PMB | Research  |                    |               |        |
|            |     |   |                    |               |        |

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| 180.00<br>180.00<br>90.00             |
|---------------------------------------|
| 180.00                                |
|                                       |
| 90.00                                 |
| , , , , , , , , , , , , , , , , , , , |
| 22.50                                 |
| 67.50                                 |
| 45.00                                 |
| 90.00                                 |
| 67.50                                 |
|                                       |
| 225.00                                |
| 45.00                                 |
|                                       |
|                                       |
| 292.50                                |
|                                       |
|                                       |

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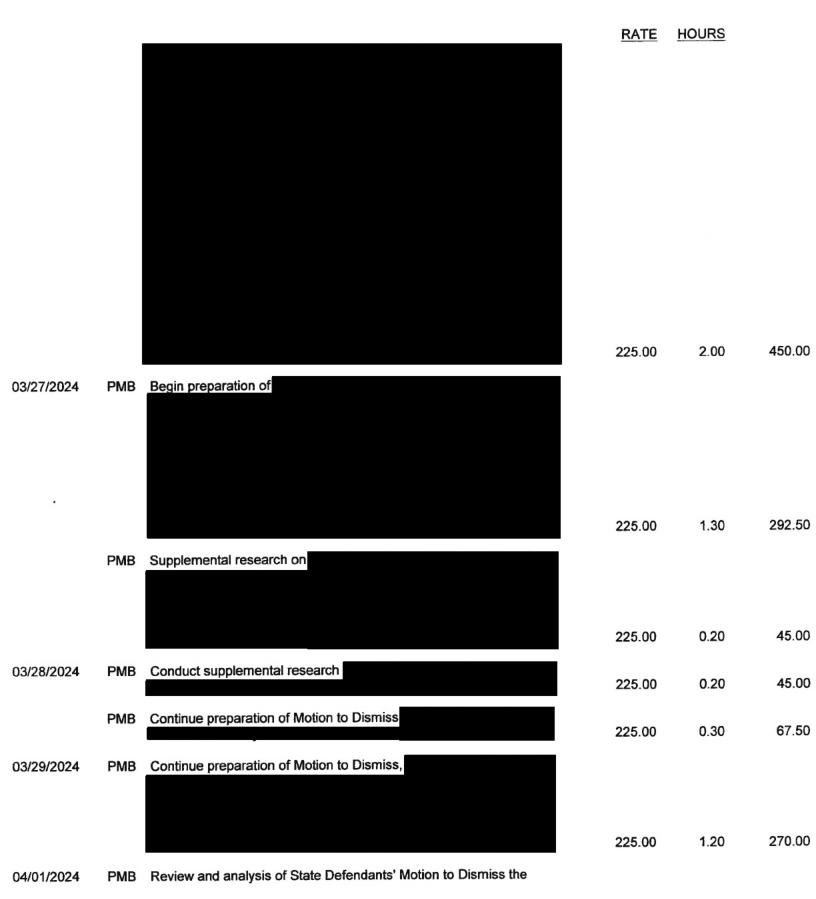
April 30, 2024

973453

Statement No:

Doe v. Elko County

Claim No.: P243-24-08998-02



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Statement No:

973453

|            |     | Complaint Pursuant to FRCP 12(b)(1), 12(b)(6), 8(a) or in the  | RATE   | <u>HOURS</u> |        |
|------------|-----|--|--------|--------------|--------|
|            | 1   | Alternative, Motion to Strike The Complaint for Violation of FRCP 12(f) and  | 225.00 | 0.20         | 45.00  |
|            |     | Review and analysis of State Defendants' Motion to Dismiss the Complaint Pursuant to FRCP 12(b)(1), 12(b)(6), 8(a) or in the Alternative, Motion to Strike The Complaint for Violation of FRCP |        |              |        |
|            | ſ   | 12(f)  | 225.00 | 0.20         | 45.00  |
|            |     | Receipt, review and detailed analysis of Motion to Dismiss filed by State of Nevada,   | 225.00 | 0.40         | 90.00  |
|            |     | Receipt, review and analysis of initial appearance materials filed by State  | 225.00 | 0.10         | 22.50  |
| 04/02/2024 | РМВ | Research for   | 225.00 | 0.80         | 180.00 |
|            | РМВ | Preparation of   | 225.00 | 0.90         | 202.50 |
|            |     | Review and analysis of State Defendants' Motion to Stay Discovery, as well as various other minor filings [notices of appearances, etc.] filed over the course of the day                      | 225.00 | 0.10         | 22.50  |
|            | BLR | Receipt, review and analysis of Mustang Ranch Defendants joinder in State Defendants' Motion to Dismiss  | 225.00 | 0.10         | 22.50  |
|            | BLR | Receipt, review and analysis of State Defendants' Motion to Stay Discovery,  | 225.00 | 0.20         | 45.00  |
|            | BLR | Receipt, review and analysis of notice of appearance along with series of joinders (x5) filed by Desert Rose Defendants  | 225.00 | 0.20         | 45.00  |
| 04/03/2024 | PMB | Conduct research on  | 225.00 | 0.10         | 22.50  |
|            | PMB | Preparation of   | 225.00 | 0.20         | 45.00  |
|            | РМВ | Conduct research   | 225.00 | 0.30         | 67.50  |
|            | PMB | Conduct research on  | 225.00 | 0.70         | 157.50 |

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973453

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |  | RATE   | HOURS |        |
|------------|-----|--|--------|-------|--------|
| 04/04/2024 | PMB | Conduct research on  | 225.00 | 0.30  | 67.50  |
|            | РМВ | Continue preparation of Motion to Dismiss  |        |       |        |
|            |     |  | 225.00 | 1.70  | 382.50 |
|            | BLR | Review and analysis of   | 005.00 | 0.00  | 425.00 |
| 04/05/2024 | PMB | Continue preparation of  | 225.00 | 0.60  | 135.00 |
|            |     |  | 205.00 | 4.00  | 270.00 |
|            | РМВ | Preparation of   | 225.00 | 1.20  | 270.00 |
|            |     |  | 225.00 | 0.40  | 90.00  |
|            | РМВ | Research   |        |       |        |
|            |     |  | 225.00 | 0.30  | 67.50  |
|            | PMB | Preparation of   | 225.00 | 0.20  | 45.00  |
|            | BLR | Additional research and consideration of   | 225.00 | 0.40  | 90.00  |
| 04/07/2024 | РМВ | Preparation of   | 225.00 | 0.40  | 90.00  |
|            |     |  | 225.00 | 0.80  | 180.00 |
|            | PMB |  | 225.00 | 0.20  | 45.00  |
|            | PMB | Preparation of   | 225.00 | 0.50  | 112.50 |
|            | РМВ | Review and revise  Motion to Dismiss for Lack Subject Matter Jurisdiction due to Lack of Constitutional Standing | 225.00 | 1.00  | 225.00 |

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Statement No:

973453

Doe v. Elko County Claim No.: P243-24-08998-02

|            |             |  |   | RATE   | <u>HOURS</u> |        |
|------------|-------------|--|---|--------|--------------|--------|
|            | PMB         | Review and analysis of   |   |        |              |        |
|            |             |  | 2 |        |              |        |
|            |             |  |   | 225.00 | 1.00         | 225.00 |
| 04/08/2024 | BLR         | Detailed work in preparation of motion to dismiss,   |   | 225.00 | 0.70         | 157.50 |
|            | BLR         | Receipt, review and analysis of Magistrate Judge Order of recusal, reassignment of matter          |   | 225.00 | 0.10         | 22.50  |
| 04/09/2024 | PMB         | Make several minor revisions to brief,   |   |        |              |        |
|            |             |  |   | 225.00 | 0.20         | 45.00  |
|            | PMB         | Continue   |   |        |              |        |
|            |             |  |   | 225.00 | 0.50         | 112.50 |
|            | BLR         | Receipt, review and analysis of Court's standing order following<br>Magistrate Judge reassignment, | I | 225.00 | 0.10         | 22.50  |
|            | BLR         | Review and revision of motion to dismiss   |   |        |              |        |
|            |             |  |   | 225.00 | 0.30         | 67.50  |
| 04/10/2024 | BLR         | Receipt, review and analysis of separate standing order issued by<br>District Judge Du,            |   | 225.00 | 0.10         | 22.50  |
|            | BLR         | Receipt, review and analysis of joinders filed by Desert Rose<br>Defendants                        |   | 225.00 | 0.10         | 22.50  |
|            | BLR         | Email conferences among all counsel re:  |   | 225.00 | 0.10         | 22.50  |
| 04/11/2024 | PMB         | Assist Attorney Ryman with   |   | 225.00 | 0.40         | 90.00  |
|            | BLR         | Ongoing email conferences among all counsel re:  |   | 005.00 | 0.00         | 4E 00  |
|            | <b>D. D</b> | Detailed work in revision of motion to diaming   |   | 225.00 | 0.20         | 45.00  |
|            | BLR         | Detailed work in revision of motion to dismiss   |   | 225.00 | 0.50         | 112.50 |

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Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |  | RATE   | HOURS |               |
|------------|-----|--|--------|-------|---------------|
| 04/12/2024 | BLR | Complete revisions of  | 225.00 | 0.90  | 202.50        |
|            | BLR | Numerous email conferences among all counsel re:   | 225.00 | 0.20  | 45.00         |
|            | BLR | Receipt, review and analysis of stipulation re: motion to dismiss briefing filed by Plaintiff and State Defendants   | 225.00 | 0.10  | 22.50         |
|            | BLR | Preparation of email to client representatives and claims representative re:   | 225.00 | 0.30  | 67.50         |
| 04/15/2024 | РМВ | Review and analysis of Def. Chicken Ranch's Motion for a More Definite Statement, and the Proposed Order which accompanied such Motion for the Court's consideration   | 225.00 | 0.10  | 22.50         |
|            | BLR | Receipt, review and analysis of Western Best/Chicken Ranch<br>Defendants' motion for more definite statement, also initial<br>appearance filings including certificate of interested parties, and<br>proposed order for motion | 225.00 | 0.20  | 45.00         |
|            | BLR | Receipt, review and analysis of  | 225.00 | 0.20  | 45.00         |
|            | BLR | Receipt, review and analysis of Court's order on State Defendants' briefing (including Motion to Stay)   | 225.00 | 0.10  | 22.50         |
|            | BLR | Receipt, review and analysis of District Court Order referring consideration of motions to Magistrate Judge  | 225.00 | 0.10  | 22.50         |
| 04/16/2024 | BLR | Receipt, review and analysis of Court's Order granting stipulation recase management conference statement,   | 225.00 | 0.10  | 22.50         |
| 04/17/2024 | BLR | Receipt, review and analysis of State Defendants' joinder in motion to dismiss for subject matter jurisdiction   | 225.00 | 0.10  | 22.50         |
|            | BLR | Various email conferences among counsel re:  | 225.00 | 0.20  | <b>4</b> 5.00 |
|            | BLR | Preparation of email report to clients re:   | 225.00 | 0.20  | 45.00         |
| 04/26/2024 | BLR | Receipt, review and detailed analysis of Plaintiff's opposition to motion to dismiss for lack of subject matter jurisdiction,  | 225.00 | 0.60  | 135.00        |
| 04/28/2024 | PMB | Review and analysis of Opposition to Nye County, Elko County and Storey County's Motion to Dismiss for Failure of Subject Matter Jurisdiction;   | 225.00 | 0.30  | 67.50         |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Jasmine Sanchez

Statement No:

973453

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |   |                                       |                    | RATE   | HOURS          | 8.7         |
|------------|-----|---|---------------------------------------|--------------------|--------|----------------|-------------|
|            | PMB | Supplemental research on  |                                       |                    |        |                | 45.00       |
|            |     |   |                                       |                    | 225.00 | 0.20           | 45.00       |
| 04/29/2024 | BLR | Receipt, review and analysis of stipulation between Chicken Ranch Defendants re: response to Completismiss briefing | n Plaintiff's and<br>laint, motion to |                    | 225.00 | 0.10           | 22.50       |
| 04/30/2024 | BLR |   | val of Motion fro                     | om                 |        |                |             |
|            |     | Chicken Ranch, in regard to motion for more defin   | ite statement,                        |                    | 225.00 | 0.10           | 22.50       |
|            | BLR | Receipt, review and analysis of separately-filed not served for various brothel defendants                          | tices of summo                        | ons                | 225.00 | 0.10           | 22.50       |
|            | BLR | Receipt, review and analysis of Court's order re: tir   | me to file motio                      | ก                  |        |                |             |
|            |     | for leave to proceed anonymously,   |                                       |                    | 225.00 | 0.10           | 22.50       |
|            | BLR | Email conferences with Plaintiff's counsel re: requeservice, response to same,                                      | est for waiver o                      | f                  | 225.00 | 0.20           | 45.00       |
|            |     | For Current Services Rendered:  |                                       |                    |        | 66.50          | 14,962.50   |
|            |     | Recapitulatio   | n                                     |                    |        |                |             |
|            |     | nekeeper  | Hours                                 | Rate               |        | OTAL           |             |
|            |     | ent L. Ryman<br>ul M. Bertone   | 20.90<br>45.60                        | \$225.00<br>225.00 |        | 02.50<br>60.00 |             |
|            | Ра  | ui M. Betone  | 40.00                                 | 220.00             | 10,2   | 00.00          |             |
|            |     | Total Current Work  |                                       |                    |        |                | 14,962.50   |
|            |     | Balance Due   | -                                     |                    |        |                | \$14,962.50 |
|            |     | Please Remit  |                                       |                    |        |                | \$14,962.50 |

# ERICKSON, THORPE& SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### **INVOICE 07-31-24-BLR**

Statement Date:

07/31/2024

Statement No. Account No.

974182 25.47850

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

Doe v. Elko County

Claim No.: P243-24-08998-02

Insured: Elko County

For all legal services rendered and costs advanced regarding the above-referenced matter.

#### **FEES**

|            | DIAD | December of   | RATE   | HOURS |        |
|------------|------|---|--------|-------|--------|
| 05/01/2024 | PMB  | Research on   |        |       |        |
|            |      |   |        |       |        |
|            |      |   |        |       |        |
|            |      |   | 225.00 | 1.30  | 292.50 |
|            | DMD  | Preparation of Reply in Support of Motion to Dismiss for lack of  |        |       |        |
|            | PMB  | standing  | 225.00 | 0.90  | 202.50 |
|            | BLR  | Email conferences with Plaintiff's counsel re: acceptance of service demand for same  | 225.00 | 0.10  | 22.50  |
|            | BLR  | Review and consideration of request for waiver of service for Elko County prepared by Plaintiff's counsel, email re: agreement for same | 225.00 | 0.20  | 45.00  |
| 05/02/2024 | PMB  | Continue preparation of Reply in Support of Motion to Dismiss,  | 225.00 | 1.00  | 225.00 |
|            |      |   |        |       |        |

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Statement No:

974182

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            | PMB | Preparation of  | 225.00 | 1.00  | 225.00 |
|            | BLR | Detailed work   | 225.00 | 0.70  | 157.50 |
| 05/06/2024 | BLR | Receipt, review and analysis of waiver of service of materials filed by Plaintiffs in regard to Mustang Ranch Defendants,   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of email correspondence from Plaintiffs' counsel re: request to stay discovery pending motion briefing, consideration of same and response, participate in numerous communications among all counsel re: same                              | 225.00 | 0.20  | 45.00  |
|            | РМВ | Review and analysis of Plaintiff's Opposition To State Defendant's Motion to Dismiss [24 pages-take notes]  | 225.00 | 0.20  | 45.00  |
| 05/07/2024 | BLR | Ongoing email conferences among all counsel re: stipulation to continue discovery, compliance with Court's direction to meet and confer   | 225.00 | 0.10  | 22.50  |
|            | BLR | prepared by Plaintiff's counsel, email conferences re: revisions and approval of same   | 225.00 | 0.10  | 22.50  |
| 05/08/2024 | BLR | Continuing email conferences among all counsel re: stipulation to stay discovery, order to meet and confer, etc.,   | 225.00 | 0.10  | 22.50  |
| 05/09/2024 | BLR | Continuing email conferences among all counsel re: motion to stay, stipulation for same and meet and confer request   | 225.00 | 0.10  | 22.50  |
| 05/10/2024 | BLR | Email conferences among all counsel re: meet and confer and<br>upcoming case management conference  | 225.00 | 0.10  | 22.50  |
| 05/13/2024 | BLR | Email conferences among all counsel re: required case management conference statement, meet-and-confer, etc., review and revision of draft joint case management conference statement prepared by Plaintiff's counsel, preparation of detailed email to all counsel re: |        |       |        |
|            |     | demanded revisions, etc.  | 225.00 | 0.30  | 67.50  |
|            | BLR | Receipt, review and analysis of filed notice of forthcoming status report prepared and filed by Plaintiff's counsel   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Court's order granting motion to stay discovery and related deadlines.  | 225.00 | 0.10  | 22.50  |
|            | BLR | Email conferences among all counsel re: stipulation for stay of discovery and upcoming case management conference   | 225.00 | 0.10  | 22.50  |
| 05/16/2024 | BLR | Various, ongoing email conferences among all counsel re: joint case   |        |       |        |

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Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |   | RATE   | HOURS |        |
|------------|-----|---|--------|-------|--------|
|            |     | conference report, review and revision of new draft,  | 225.00 | 0.20  | 45.00  |
| 05/17/2024 | BLR | Numerous, ongoing email conferences among all counsel re: case management conference statement and revisions, approval of same  | 225.00 | 0.20  | 45.00  |
|            | BLR | Receipt, review and analysis of filed case management conference statement, ensure compliance with approval and   | 225.00 | 0.10  | 22.50  |
|            | BLR | Receipt, review and analysis of Chicken Ranch Defendants' joinder to motion to dismiss for improper use of pseudonym  | 225.00 | 0.10  | 22.50  |
| 05/19/2024 | BLR | Receipt, review and analysis of email communications from counsel for Chicken Ranch re:   | 225.00 | 0.20  | 45.00  |
|            | BLR | Review and analysis of  | 225.00 | 0.30  | 67.50  |
| 05/21/2024 | BLR | Receipt, review and analysis of email from third party re: purported intent to intervene, allegations against brothel Defendant and Plaintiff, research                   | 225.00 | 0.30  | 67.50  |
| 05/24/2024 | BLR | Receipt, review and analysis of stipulation and order re: Plaintiff's response to State Defendants' motion to dismiss   | 225.00 | 0.10  | 22.50  |
|            | BLR | Conduct internet research   | 225.00 | 0.20  | 45.00  |
| 05/28/2024 | BLR | Receipt, review and analysis of Court's order on stipulation related to<br>State briefing   | 225.00 | 0.10  | 22.50  |
| 05/30/2024 | РМВ | Review and analysis of correspondence from Plaintiff seeking to satisfy "meet and confer" requirements concerning a Motion for Protective Order over Pseudonym in Caption | 225.00 | 0.10  | 22.50  |
|            | PMB | Begin reviewing   | 225.00 | 0.10  | 22.50  |
|            | PMB | Preparation of correspondence to Plaintiff's counsel  | ĺ      |       |        |
|            |     |   | 225.00 | 0.20  | 45.00  |
|            | BLR | Receipt, review and analysis of email correspondence from Plaintiff's counsel re: "meet and confer" for motion for protective order, review                               |        |       |        |
|            |     |   | 225.00 | 0.50  | 112.50 |

| Insured:   | Elko C | county  |        |       |        |
|------------|--------|---|--------|-------|--------|
|            |        |   | RATE   | HOURS |        |
| 05/31/2024 | PMB    | Review and analysis of Motion for Protective Order and Leave to<br>Proceed Pseudonymously,                          | 225.00 | 0.20  | 45.00  |
|            | РМВ    | Review and analysis of  | 225.00 | 0.30  | 67.50  |
|            | PMB    | Review and analysis of [Proposed] Order Granting Motion for<br>Protective Order and Leave to Proceed Pseudonymously | 225.00 | 0.20  | 45.00  |
|            | РМВ    | Review and analysis of  | 225.00 | 0.20  | 45.00  |
|            | РМВ    | Begin research to   | 225.00 | 0.40  | 90.00  |
|            | PMB    | Research  | 225.00 | 0.30  | 67.50  |
|            | BLR    | Receipt, review and analysis of   | 225.00 | 0.60  | 135.00 |
|            | BLR    | Various email and telephone conferences among defense counsel   | 225.00 | 0.20  | 45.00  |
|            | BLR    | Receipt, review and analysis of State of Nevada Defendants' reply in support of motion to dismiss,                  | 225.00 | 0.30  | 67.50  |
| 06/04/2024 | PMB    | Brief supplemental research on  | 225.00 | 0.10  | 22.50  |
|            | РМВ    | Continue preparation of Opposition to Motion for Protective Order and for Leave to Proceed Pseudonymously,          | 225.00 | 1.70  | 382.50 |
| 06/06/2024 | РМВ    | Major editing and revision  |        |       |        |

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974182

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

| Insured:   | : Elko Co | ounty   |        |       |        |
|------------|-----------|---|--------|-------|--------|
|            |           |   | RATE   | HOURS |        |
|            |           |   | 225.00 | 1.20  | 270.00 |
| 06/07/2024 | РМВ _(    | Conduct some supplemental research on   |        |       |        |
|            |           |   | 225.00 | 0.20  | 45.00  |
|            | PMB       | After   |        | - 20  | 45.00  |
|            | ı         |   | 225.00 | 0.20  | 45.00  |
|            | BLR       | Work in preparation of  | 225.00 | 0.50  | 112.50 |
| 06/10/2024 | BLR       | Receipt, review and analysis of Mustang Ranch Defendants' Joinder   | 225.00 | 0.10  | 22.50  |
| 06/11/2024 |           | Preparation of brief correspondence to Attorney Ryman   | 225.00 | 0.10  | 22.50  |
| 06/12/2024 | BLR       | Receipt, review and analysis of   | 225.00 | 0.20  | 45.00  |
|            | BLR       | Receipt, review and analysis of State Defendants' joinder in response   | 225.00 | 0.10  | 22.50  |
| 06/13/2024 | PMB       | Review and analysis of State Defendants' Joinder in County<br>Defendant's Opposition to Motion for Protective Order   | 225.00 | 0.10  | 22.50  |
|            | РМВ       | Review and analysis of Defendant Desert Rose Club's Joinder in<br>Counties' Opposition to Motion for Protective Order   | 225.00 | 0.10  | 22.50  |
|            | РМВ       | Plaintiff's Motion for a Protective Order And Leave to Proceed<br>Pseudonymously  | 225.00 | 0.10  | 22.5   |
|            | PMB       | Review and analysis of Declaration of Kenneth R. Green, filed as<br>supportive evidence for Western Best's above Opposition to Motion<br>for Protective Order | 225.00 | 0.10  | 22.5   |
|            | PMB       | Opposition to Motion for Protective Order   | 225.00 | 0.10  | 22.5   |
|            | РМВ       | Engage in series of email correspondence with counsel for Best Western Defendants re  |        |       |        |

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974182

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

| Insured:   | EIKO C | ounty  |        |              |              |
|------------|--------|--|--------|--------------|--------------|
|            |        |  | RATE   | <u>HOURS</u> |              |
|            |        |  | 225.00 | 0.30         | 67.50        |
|            | BLR    | Receipt, review and analysis of  |        |              |              |
|            |        |  | 225.00 | 0.20         | 45.00        |
|            | BLR    | Receipt, review and analysis of Errata filed by Western Best Defendants,   | 225.00 | 0.10         | 22.50        |
|            | BLR    | Receipt, review and analysis of State Defendants' joinder to Western Best briefing   | 225.00 | 0.10         | 22.50        |
|            | BLR    | Receipt, review and analysis of Plaintiff's detailed reply in support of   |        |              |              |
|            |        |  | 225.00 | 0.30         | 67.50        |
| 06/14/2024 | PMB    | Review and analysis of Notice of Errata filed by Best Western Defendants   | 225.00 | 0.10         | 22.50        |
|            | PMB    | Preparation of correspondence to Atty Ryman  |        |              |              |
|            |        |  | 225.00 | 0.10         | 22.50        |
|            | РМВ    | Review and analysis of Joinder to Western Best Defendants' Opposition to Plaintiff's Motion for a Protective Order and Leave To Proceed Pseudonymously | 225.00 | 0.10         | 22.5         |
| 06/17/2024 | РМВ    | Review and analysis of   | 225.00 | 0.10         | 22.5         |
|            | PMB    | Research to  | 225.00 | 0.20         | <b>45</b> .0 |
|            | PMB    | Preparation of Motion for Leave of Court to Supplement Motion to Dismiss for Lack of Subject Matter Jurisdiction due to Lack of Standing               | 225.00 | ) 0.30       | 67.\$        |
|            |        |  |        |              |              |

Page 110 of 131 July 31, 2024 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Jasmine Sanchez 974182 Statement No: Doe v. Elko County Claim No.: P243-24-08998-02 Insured: Elko County **HOURS** RATE PMB Review and analysis of Plaintiff's Reply in Support of Motion for 22.50 225.00 0.10 Protective Order Review and analysis of correspondence from Atty Deanna Forbush, PMB counsel for Chicken Ranch Defendants, re 45.00 0.20 225.00 Preparation of PMB 06/19/2024 67.50 225.00 0.30 PMB Exchange series of email correspond. with Deanna Forbush, counsel for Chicken Ranch defendants, 22.50 0.10 225.00 Revision and preparation of 67.50 0.30 225.00 PMB Review and analysis of series of email communications from 06/20/2024 co-defense counsel Deanna Forbush 67.5 0.30 225.00 PMB Review and analysis of 22.5 0.10 225.00

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Doe v. Elko County Claim No.: P243-24-08998-02

|            |      |  |        |       | , , , , , , , , , , , , , , , , , , , |
|------------|------|--|--------|-------|---------------------------------------|
|            |      |  | RATE   | HOURS |                                       |
|            | BLR  | Receipt, review and analysis of Plaintiff's detailed response/reply re:<br>motion for protective order, responding to Western Best Defendants'<br>arguments  | 225.00 | 0.20  | 45.00                                 |
| 06/21/2024 | PMB  | Review and analysis of Plaintiff's Reply against Western Best Defendants' Opposition to Pl's Motion for Protective Order [ECF No. 85]                        | 225.00 | 0.20  | 45.00                                 |
|            | PMB  | Telephone conference with Deanna Forbush, counsel for Western<br>Best, re  | 225.00 | 0.10  | 22.50                                 |
|            | РМВ  | Review and analysis of   |        |       |                                       |
|            |      |  |        |       |                                       |
|            |      |  | 225.00 | 0.10  | 22.50                                 |
| 06/24/2024 | РМВ  | Review and analysis of State Defendant's Motion to Take Judicial Notice or in the Alternative Motion for Leave to Supplement Motion to Dismiss (ECF No. 86). |        |       |                                       |
|            |      |  |        |       |                                       |
|            |      |  | 225.00 | 0.10  | 22.50                                 |
|            | РМВ  | Conduct very brief research to   | 225.00 | 0.10  | 22.50                                 |
|            | PMB  | B Discuss with Attorney Ryman  | 225.00 |       | 0.00                                  |
|            | BLR  | Receipt, review and analysis of motion for judicial notice filed by  |        |       |                                       |
|            | DLIV | State Defendants re:   | 225.00 | 0.20  | 45.0                                  |
|            | BLR  | Receipt, review and analysis of email communications from lobbyist   | 225.00 | 0.10  | 22.5                                  |
| 06/25/2024 | PME  | Review and analysis of correspondence from co-defense counsel for the Chicken Ranch defendants, re:  |        |       |                                       |
|            |      |  | 225.00 | 0.20  | <b>45</b> .0                          |
|            |      |  |        |       |                                       |

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974182

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

| : Elko ( | County   |        |       |       |
|----------|--|--------|-------|-------|
| PMB      | Perform a summary review of  | RATE   | HOURS |       |
|          |  | 225.00 | 0.20  | 45.00 |
| PMB      | Preparation of correspondence to Attorney Ryman  |        |       |       |
|          |  | 225.00 | 0.10  | 22.50 |
| PMB      | Review and analysis of correspondence from Attorney Ryman with   | 225.00 | 0.10  | 22.50 |
| PMB      | Per instruction from Attorney Ryman,   |        |       |       |
|          |  | 225.00 | 0.10  | 22.50 |
| РМВ      | Review and analysis of Verified Petition for Pro Hac Vice application forms for three separate attorneys of the National Center on Sexual Exploitation (ECF Nos. 87, 88, 89) | •      |       |       |
|          | Exploitation (ECF Nos. 67, 66, 65)   | 225.00 | 0.20  | 45.00 |
| PMB      | Detailed review and analysis of  | 225.00 | 0.10  | 22.50 |
| PMB      | Preparation of Opposition to Verified Petitions [ECF No. 90].  |        |       |       |
|          |  | 225.00 | 0.40  | 90.00 |
| PMB      | Assist with revision and editing of same Opposition,   |        |       |       |
|          |  | 225.00 | 0.20  | 45.00 |
| BLR      | Various email conferences among defense counsel re:  |        |       |       |
|          |  | 225.00 | 0.20  | 45.00 |
| BLR      | Receipt, review and analysis of series of motions for pro hac vice admission to District of Nevada from various National Center on Sexual Exploitation attorneys             |        |       |       |
|          | COMMI ENPIREMENT STORY   | 225.00 | 0.30  | 67.5  |
| BLR      | Detailed work in   |        |       |       |
|          |  |        |       |       |

Page 113 of 131 July 31, 2024 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Jasmine Sanchez

974182

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

| Insured:   | Elko C | county  |        |       |        |
|------------|--------|---|--------|-------|--------|
|            |        |   | RATE   | HOURS |        |
|            |        |   | 225.00 | 0.70  | 157.50 |
| 06/26/2024 |        | Review and analysis of State defendants' (Governor and Atty<br>General) Joinder in County Defendants Opposition To Pro Hac Vice<br>Petitions  | 225.00 | 0.10  | 22.50  |
|            | PMB    | Review and analysis of Chicken Ranch Defendants Opposition to Plaintiff's Attorneys' Motion to Practice Pro Hac Vice (ECF No. 92), as well as detailed analysis of extensive exhibits (ECF Nos. 92-1, 92-2, and 92-3) | 225.00 | 0.20  | 45.00  |
|            | РМВ    | Conduct supplemental research to  |        |       |        |
|            |        |   |        |       |        |
|            |        |   | 225.00 | 0.20  | 45.00  |
|            | PMB    | Preparation of correspondence to counsel for Chicken Ranch Defendants (Atty Deanna Forbush)   |        |       |        |
|            |        | Defendants (Atty Dearma 1 orbasily  | 225.00 |       | 0.00   |
|            | BLR    | Receipt, review and analysis of State of Nevada Defendants' joinder to response to motions for pro hac vice admission   | 225.00 | 0.10  | 22.50  |
|            | BLR    | Receipt, review and analysis of opposition to motions for pro hac vice admission filed by Western Best Defendants,  |        |       |        |
|            |        |   | 225.00 | 0.30  | 67.50  |
| 06/28/2024 | BLR    | Receipt, review and analysis of Mustang Rang Defendants' joinder to opposition to motion for pro hac vice admission   | 225.00 | 0.10  | 22.50  |
| 07/02/2024 | PMB    | Review and analysis of Motion to Amend,   |        |       |        |
|            |        |   | 225.00 | 0.10  | 22.50  |
|            | РМВ    | Review and analysis of Motion to Amend,   |        |       |        |
|            |        |   | 225.00 | 0.10  | 22.5   |
|            | PMB    | Exchange several email corresp. with counsel for Chicken Ranch defendants, Deanna Forbush, re   | 225.00 | 0.10  | 22.5   |
|            | BLR    | Receipt, review and analysis of corrected pro hac vice applications from NCOSE attorneys  |        | ž.    |        |

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974182

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     | •   |        |              |       |
|------------|-----|---|--------|--------------|-------|
|            |     |   | RATE   | <u>HOURS</u> |       |
|            |     |   | 225.00 | 0.20         | 45.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's combined reply in support of motions to permission for pro hac vice admission,                    | 225.00 | 0.30         | 67.50 |
|            | BLR | Receipt, review and analysis of Plaintiff's combined response to motion for leave of court to supplement (re: USSC cert denial),              |        |              |       |
|            |     |   | 225.00 | 0.30         | 67.50 |
| 07/03/2024 | PMB | Review and analysis of Plaintiff's combined response to State and County Defendants' Motion for Leave to Supplement Record (ECF Nos. 96 & 97) | 225.00 | 0.10         | 22.50 |
|            | PMB | Review and analysis of Plaintiff's Reply in Support of Pro Hac Vice petitions (ECF No. 98)  | 225.00 | 0.10         | 22.50 |
|            | РМВ | Conference with Attorney Ryman re   |        |              |       |
|            |     |   | 225.00 |              | 0.00  |
| 07/09/2024 | BLR | Receipt, review and analysis of State Defendants reply in support of motion to dismiss,   | 225.00 | 0.20         | 45.00 |
|            | BLR | Work in   | 225.00 | 0.30         | 67.50 |
|            | BLR | Receipt, review and analysis of State Defendants reply in support of motion for judicial notice,  | 225.00 | 0.20         | 45.00 |
| 07/10/2024 | РМВ | Review and analysis of State Defendants Reply in Support of Motion for Judicial Notice (ECF No. 99)   | 225.00 | 0.10         | 22.50 |
|            | PMB | Research to   |        |              |       |
|            |     |   |        |              |       |
|            |     |   |        |              |       |
|            |     |   |        |              |       |
|            |     |   | 225.00 | 0.30         | 67.5  |
|            |     |   | _      |              |       |

Page: 12 Page 115 of 131 July 31, 2024 Jasmine Sanchez 974182 Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

Insured: Elko County

| 11100100   |     | •  |           |        |               |                   |
|------------|-----|--|-----------|--------|---------------|-------------------|
|            |     |  |           | RATE   | HOURS         |                   |
|            | PMB | Preparation of   |           | 225.00 | 0.50          | 112.50            |
|            | BLR | Receipt, review and analysis of notice of docket corrections   | ге:       | 225.00 | 0.10          | 22.50             |
|            |     | recent filing,   |           |        |               |                   |
| 07/11/2024 | PMB | Review and analysis of   |           | 225.00 | 0.10          | 22.50             |
|            | PMB | Preparation of correspondence to Attorney Ryman  |           |        |               |                   |
|            |     |  |           |        |               |                   |
|            |     |  |           |        |               |                   |
|            |     |  |           | 225.00 | 0.10          | 22.50             |
|            | РМВ | Receive back correspondence from Attorney Ryman  |           |        |               |                   |
|            |     |  |           | 225.00 |               | 0.00              |
| 07/23/2024 | BLR | Receipt, review and analysis of notice of change of address<br>Attorney General's office on behalf of state defendants | s from    | 225.00 | 0.10          | 22.50             |
| 07/25/2024 | BLR | Receipt, review and analysis of District Court's Order (minudenying motion to deny pro hac vice admission,             | te order) | 005.00 | 0.10          | 22.50             |
|            |     |  |           | 225.00 | 0.10          | 22.50             |
|            | BLR | Receipt, review and analysis of Court's order denving (since-amended) pro hac vice admissions,                         |           |        |               |                   |
|            |     |  |           |        |               |                   |
|            |     |  |           | 225.00 | 0.20<br>28.90 | 45.00<br>6,502.50 |
|            |     | For Current Services Rendered:   |           |        | 20.00         | 5,5               |
|            | 5   | Recapitulation Hours   | Rate      |        | TOTAL         |                   |
|            |     | imekeeper 11.90  | \$225.00  | \$2,   | 677.50        |                   |
|            |     | Paul M. Bertone 17.00  | 225.00    | 3,     | 825.00        |                   |
|            |     | Total Current Work   |           |        |               | 6,502.50          |

**Payments** 

Payment - Nevada POOL 07/03/2024 Payment - write downs Invoice #973453 07/03/2024

**Total Current Work** 

Total Previous Billings

-14,827.50 -135.00

\$14,962.50

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 116 of 131 Page: 13 July 31, 2024 Jasmine Sanchez

Jasiffile Carlotte

Statement No:

974182

Doe v. Elko County

Claim No.: P243-24-08998-02

insured: Elko County

Total Payments -14,962.50

\$6,502.50 \$6,502.50

Please Remit \$6,502.50

# ERICKSON, THORPE& SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

#### ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

#### **INVOICE 09-29-24-BLR**

Statement Date: Statement No. 09/29/2024 974228

Account No.

25.47850

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

Doe v. Elko County

Claim No.: P243-24-08998-02

Insured: Elko County

For all legal services rendered and costs advanced regarding the above-referenced matter.

## **FEES**

|            |     | <u>. — —</u>  |        |       |       |
|------------|-----|---|--------|-------|-------|
|            |     |   | RATE   | HOURS |       |
| 07/29/2024 | BLR | Receipt, review and analysis of detailed motion to intervene as<br>Defendant filed by A Safer Nevada political action committee,    |        |       |       |
|            |     |   | 225.00 | 0.30  | 67.50 |
| 08/07/2024 | BLR | Review and analysis of notices of refiling for motion to intervene and appearances related to Russel Greer's motion to intervene    | 225.00 | 0.10  | 22.50 |
| 08/12/2024 | PMB | Review and analysis Plaintiff's Opposition to Mr. Greer's Motion to Intervene (ECF No. 111, consisting of 11 pages) and also review |        |       |       |
|            |     |   |        |       |       |
|            |     |   | 225.00 | 0.20  | 45.00 |
|            | BLR | Receipt, review and analysis of Plaintiff's response to motion for intervenor by Russell Greer,                                     |        |       |       |
|            |     | intervenor by Nussen Cross,   | 225.00 | 0.20  | 45.00 |
| 08/16/2024 | РМВ | Review and analysis of Order of August 16, 2024, dismissing all claims against County Defendants with prejudice                     | 225.00 | 0.30  | 67.50 |
|            |     |   |        | Page  | 1     |

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Statement No:

974228

Doe v. Elko County Claim No.: P243-24-08998-02

| Insured    | : Elko (     | County  |        |       |        |
|------------|--------------|---|--------|-------|--------|
|            |              |   | RATE   | HOURS |        |
|            | BLR          | Preparation of detailed email to clients and claims representatives re:   | 225.00 | 0.30  | 67.50  |
|            | BLR          | Receipt, review and analysis of detailed order granting motion to dismiss for lack of subject matter jurisdiction.                      | 225.00 | 0.30  | 67.50  |
|            | BLR          | Research  |        |       |        |
|            |              |   | 225.00 | 0.50  | 112.50 |
| 08/20/2024 | BLR          | Email conferences with Attorney General's office re:  | 225.00 | 0.10  | 22.50  |
|            | BLR          | Research  |        |       |        |
|            |              |   | 225.00 | 0.50  | 112.50 |
| 08/21/2024 | BLR          | Additional email conferences among public entity defense counsel re:  | 225.00 | 0.10  | 22.50  |
| 08/29/2024 | BLR          | Receipt, review and analysis of Plaintiff's motion for entry of default against Hacienda Defendant, along with accompanying declaration | 225.00 | 0.10  | 22.50  |
|            | BLR          | Continue research   | 225.00 | 0.70  | 157.50 |
| 08/30/2024 | BLR          | Receipt, review and analysis of Plaintiff's detailed response to court's order to show cause re:  |        |       |        |
|            |              |   | 225.00 | 0.30  | 67.50  |
| 09/03/2024 | BLR          | Various telephone conferences among counsel re:   |        |       | 45.00  |
|            |              |   | 225.00 | 0.20  | 45.00  |
| 09/04/2024 | PMB          | Research to   | 225.00 | 0.80  | 180.00 |
|            | P <b>M</b> B | Research for  |        |       |        |
|            |              |   | 225.00 | 0.70  | 157.50 |
|            | PMB          | Review and analysis of  |        |       |        |
|            |              |   |        |       |        |
|            |              |   |        |       |        |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Jasmine Sanchez

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Page: 3

Statement No:

974228

Doe v. Elko County Claim No.: P243-24-08998-02

|            |     |   | <u>RATE</u> 225.00 | HOURS<br>0.40 | 90.00  |
|------------|-----|---|--------------------|---------------|--------|
|            | BLR | Preparation of detailed email report to all clients re:   |                    | 0.00          | 07.50  |
|            |     |   | 225.00             | 0.30          | 67.50  |
| 09/05/2024 | PMB | Review and analysis of  |                    |               |        |
|            |     |   | 225.00             | 0.10          | 22.50  |
|            | РМВ | Begin preparation of Motion for Certification and Entry of Final Judgment Pursuant to FRCP 54(b),                 |                    |               |        |
|            |     |   | 225.00             | 1.50          | 337.50 |
|            |     |   | 225.00             | 1.50          | 337.30 |
|            | PMB | Revisit   | 225.00             | 0.10          | 22.50  |
|            | PMB | Preparation of  |                    |               |        |
|            |     |   | 225.00             | 0.10          | 22.50  |
| 09/06/2024 | PMB | Continue  |                    |               |        |
|            |     |   | 225.00             | 0.40          | 90.00  |
|            | РМВ | Preparation of  | 225.00             | 0.10          | 22.50  |
|            | BLR | Email conferences among counsel re:   | 225.00             | 0.10          | 22.50  |
|            | BLR | Receipt, review and analysis of pro hac vice petition filed by attorney   |                    |               |        |
|            |     | Benjamin Bull   | 225.00             | 0.10          | 22.50  |
|            | BLR | Receipt, review and analysis of pro hac vice petition filed by Danielle Pinter,                                   | 225.00             | 0.10          | 22.50  |
| 09/08/2024 | PMB | Revise  | 225.00             | 0.80          | 180.00 |
| 09/09/2024 | BLR | Receipt, review and analysis of District Court's orders granting motions for permission to practice pro hac vice. | 225.00             | 0.10          | 22.50  |
|            | BLR | Detailed work   |                    |               |        |
|            |     |   | 225.00             | 1.50          | 337.50 |
|            |     |   |                    |               |        |

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Page: 4

974228

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

|         |            | -  |        |       |       |
|---------|------------|--|--------|-------|-------|
|         | era . DIAD | Review and analysis of Proposed Defendant Intervenor's Request   | RATE   | HOURS |       |
| 09/10/2 | 2024 PMB   | for Judicial Notice  | 225.00 | 0.10  | 22.50 |
|         | РМВ        | Review and analysis of   | 225.00 | 0.10  | 22.50 |
|         | РМВ        | Preparation of brief email to Attorney Ryman   |        |       |       |
|         |            |  | 225.00 | 0.10  | 22.50 |
|         | BLR        | Receipt, review and analysis of intervenor Russell Greer's "request for judicial notice" and review of                             | 225.00 | 0.30  | 67.50 |
|         | BLR        | Preparation of email report to all clients re:   | 220.00 | 0.50  | 07.00 |
|         | DLIN       | Preparation of chiair report to an order   | 225.00 | 0.30  | 67.50 |
| 09/12/2 | 2024 PMB   | Review and analysis of Clerks Entry of Default against Hacienda Rooming House  | 225.00 | 0.10  | 22.50 |
|         | PMB        | Review and analysis of Mustang Ranch's Response to Plaintiff's Response to Order To Show Cause [ECF NO. 115]                       | 1      |       |       |
|         |            |  |        |       |       |
|         |            |  | 225.00 | 0.20  | 45.00 |
|         | BLR        | Receipt, review and analysis of Clerk's entry of default against brothel Defendant Hacienda Rooming House                          | 225.00 | 0.10  | 22.50 |
|         | BLR        | Receipt, review and analysis of detailed response/opposition to<br>Plaintiff's response to order to show cause,                    | l      |       |       |
|         |            |  | 225.00 | 0.20  | 45.00 |
| 09/13/2 | 2024 BLR   | Receipt, review and analysis of detailed response to Plaintiff's brief re: OSC order filed by Desert Rose Club brothel Defendants, | 225.00 | 0.20  | 45.00 |
| 09/16/2 | 2024 PMB   | Review and analysis of Joinder of State Defendants in County   | 220.00 |       |       |
| USI IOI | 2024 FIND  | Defendants' Motion for Rule 54(b) Cert. (ECF No. 130)  | 225.00 | 0.10  | 22.50 |
|         | РМВ        | Review and analysis of Hacienda Room's Notice of Unavailability and Request for Continuance (ECF No. 129)                          | 225.00 | 0.10  | 22.50 |
|         |            |  |        |       |       |

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Jasmine Sanchez

Page: 5
September 29, 2024

974228

Statement No:

Doe v. Elko County

Claim No.: P243-24-08998-02

|            |     |   | RATE   | <b>HOURS</b> |       |
|------------|-----|---|--------|--------------|-------|
|            | PMB | Review and analysis of Hacienda's Joinder in Brothel Defendant's Response to Plaintiff's Respons to Order to Show Cause (ECF No. 128)   | 225.00 | 0.10         | 22.50 |
|            | PMB | Review and analysis of Hacienda's Response to Plaintiff's Response to Order to Show Cause (ECF No. 127)                                 | 225.00 | 0.10         | 22.50 |
|            | РМВ | Review and analysis of Hacienda's Response to Request for Default   | 225.00 | 0.10         | 22.50 |
|            | РМВ | Review and analysis of Notice of Appearance for Counsel of Hacienda Room (ECF No. 125)  | 225.00 | 0.10         | 22.50 |
|            | BLR | Receipt, review and analysis of notice of appearance of counsel for<br>Defendant Hacienda Rooming house (defaulted)                     | 225.00 | 0.10         | 22.50 |
|            | BLR | Receipt, review and analysis of Defendant Hacienda Rooming House response to motion for entry of default judgment,                      |        |              |       |
|            |     |   | 225.00 | 0.20         | 45.00 |
|            | BLR | Receipt, review and analysis of Defendant Hacienda Rooming<br>House response to Order to Show Cause                                     | 225.00 | 0.10         | 22.50 |
|            | BLR | Receipt, review and analysis of Defendant Hacienda Rooming House joinder in previous filings,   | 225.00 | 0.10         | 22.50 |
|            | BLR | Receipt, review and analysis of motion to continue deadlines filed by<br>Hacienda Rooming House attorney                                | 225.00 | 0.10         | 22.50 |
|            | BLR | Receipt, review and analysis of State Defendants' joinder to County<br>Defendants' motion for certification of final judgment           | 225.00 | 0.10         | 22.50 |
| 09/18/2024 | BLR | Email and telephone conferences with co-defense counsel re:   | 225.00 | 0.20         | 45.00 |
|            | BLR | Receipt, review and analysis of   | 225.00 | 0.20         | 45.00 |
| 09/23/2024 | PMB | Review and analysis of Plaintiff's Opposition to County Defendants' Motion for Certification and Entry of Final Judgment (ECF No. 131), | 225.00 | 0.10         | 22.50 |
|            | BLR | Receipt, review and analysis of Plaintiff's opposition to motion for certification of final judgment,                                   | 225.00 | 0.20         | 45.0  |
|            | BLR | Email conference with counsel for Hacienda Ranch re:  |        |              |       |
|            |     |   |        |              |       |

974228 Statement No: Doe v. Elko County Claim No.: P243-24-08998-02 Insured: Elko County **HOURS** RATE 22.50 0.10 225.00 Receipt, review and analysis of Plaintiff's detailed response to BLR 09/24/2024 request for judicial notice filed by Russell Greer, 45.00 0.20 225.00 3,465.00 15.40 For Current Services Rendered: Recapitulation TOTAL Rate **Hours** Timekeeper \$1,935.00 \$225.00 8.60 Brent L. Ryman 1,530.00 225.00 6.80 Paul M. Bertone 3,465.00 **Total Current Work** \$6,502.50 **Total Previous Billings** \$9,967.50 **Balance Due** 

Document 160-1

Filed 02/28/25

Case 3:24-cv-00065-MMD-CSD

Please Remit

Jasmine Sanchez

Page: 6

\$9,967.50

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# ERICKSON, THORPE& SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505 ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

# **INVOICE 12-07-24-BLR**

Statement Date: Statement No. Account No. 12/07/2024 974688 25.47850

Jasmine Sanchez Davies-Group 639 Isbell, Suite 390 Reno, NV 89509

Doe v. Elko County

Claim No.: P243-24-08998-02

Insured: Elko County

For all legal services rendered and costs advanced regarding the above-referenced matter.

## **FEES**

|            |        |                        | RATE   | HOURS |        |
|------------|--------|------------------------|--------|-------|--------|
| 09/24/2024 | РМВ    | Begin research for     |        |       |        |
|            |        |                        |        |       |        |
|            |        |                        |        |       |        |
|            |        |                        |        |       |        |
|            |        |                        | 225.00 | 0.30  | 67.50  |
|            | PMB    | Review and analysis of |        | 0.40  | 90.00  |
|            | 1 1415 |                        | 225.00 | 0.40  | 90.00  |
|            | PMB    | Research to            |        |       |        |
|            |        |                        |        |       |        |
|            |        |                        |        |       |        |
|            |        |                        | 225.00 | 1.00  | 225.00 |
|            | DMP    | Research               |        |       |        |
|            | PMB    | Research               |        | Page  | 1      |

Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Page 124 of perember 07, 2024 Jasmine Sanchez

974688

Statement No:

Doe v. Elko County

Claim No.: P243-24-08998-02

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Page: 3 Page 125 of December 07, 2024 Jasmine Sanchez 974688 Statement No:

Doe v. Elko County

Claim No.: P243-24-08998-02 Insured: Elko County

| msuleu.    | EIKO O | Surry   |        |       |        |
|------------|--------|---|--------|-------|--------|
|            |        | Defendants re   | RATE   | HOURS |        |
| 10/01/2024 |        | Email conferences with counsel for Hacienda Defendants re:  | 225.00 | 0.10  | 22.50  |
|            | BLR    | Receipt, review and analysis of Western Best Defendants joinder to order to show cause briefing and/or response | 225.00 | 0.10  | 22.50  |
|            | РМВ    | Continue with research on   |        |       | -22.50 |
|            | 1      |   | 225.00 | 1.30  | 292.50 |
| 10/02/2024 | BLR    | Review and analysis of  |        |       |        |
|            |        |   | 225.00 | 0.90  | 202.50 |
|            | BLR    | Travel from Reno office to Las Vegas federal court via air and car for hearing on pseudonym                     | 112.50 | 1.10  | 123.75 |
|            | BLR    | Return travel from Las Vegas federal court to Reno office, via air and car, following hearing                   | 112.50 | 1.20  | 135.00 |
|            | РМВ    | Continue research   |        |       |        |
|            |        |   |        |       |        |
|            |        |   | 225.00 | 1.50  | 337.50 |
| 10/03/2024 | PMB    | Continue research   |        |       |        |
|            |        |   |        |       |        |
|            |        |   |        |       |        |
|            |        |   | 225.00 | 0.30  | 67.5   |
|            | BLR    | Email conferences with counsel for Hacienda Defendants re:  | 225.00 | 0.10  | 22.5   |
| 10/04/2024 | BLR    | Email conference with counsel for SHAC LLC re:  | 225.00 | 0.10  | 22.5   |
| 10/07/2024 | РМВ    | Begin preparation of  | 225.00 | 0.30  | 67.5   |
| 10/08/2024 | BLR    | Receipt, review and analysis of   |        |       |        |

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Page 126 of December 07, 2024 Jasmine Sanchez 974688

Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02

| Insured:   | Elko C | county  |        |        |        |
|------------|--------|---|--------|--------|--------|
|            | ı      |   | RATE   | HOURS  |        |
|            |        |   | 225.00 | 0.20   | 45.00  |
|            | PMB    | Conclude memorandum re  | 225.00 | 1.00   | 225.00 |
| 10/09/2024 | BLR    | Receipt, review and analysis of proposed intervenor's motion for hearing,                                   | 225.00 | 0.10   | 22.50  |
| 10/11/2024 | BLR    | Preparation of email reports re:  | 225.00 | 0.10   | 22.50  |
| 10/14/2024 | BLR    | Receipt, review and analysis of opposition by Bella's defendants re:<br>Motion to strike filed by Plaintiff | 225.00 | 0.10   | 22.50  |
| 10/15/2024 | BLR    | Email conferences among clients and claims representative re:   | 225.00 | 0.20   | 45.00  |
| 10/18/2024 | BLR    | Receipt, review and analysis of District Court's detailed order addressing various pending motions,         | 225.00 | 0.30   | 67.50  |
| 10/21/2024 | РМВ    | Review and analysis of Order [ECF No. 141]  |        |        |        |
|            |        |   | 225.00 | 0.20   | 45.00  |
|            | PMB    | Telephone conference with Deanna Forbush (counsel for one of brothels)                                      |        |        |        |
|            |        | × a   | 225.00 | 0.20   | 45.0   |
|            | PME    | Preparation of brief correspondence to Attorney Forbush,  |        |        |        |
|            |        |   | 225.00 | 0.10   | 22.5   |
|            | BLF    | Receipt, review and analysis of email correspondence from proposed intervenor Russell Greer re:             | 225.00 | ) 0.10 | 22.5   |

Page 127 objectmber 07, 2024 Jasmine Sanchez 974688 Statement No:

Doe v. Elko County Claim No.: P243-24-08998-02 Insured: Elko County

|     | mourea.    | LING | , outly  |        |              |       |
|-----|------------|------|--|--------|--------------|-------|
|     |            |      |  | RATE   | <u>HOURS</u> |       |
|     |            | BLR  | Preparation of email report to counsel re:   | 225.00 | 0.10         | 22.50 |
| 10/ | /22/2024   | BLR  | Email conferences with representative of private defendants re:                                      | 225.00 | 0.10         | 22.50 |
|     |            | BLR  | Preparation of detailed email report to clients and claims representative re:                        | 225.00 | 0.30         | 67.50 |
| 10  | )/23/2024  | PMB  | Review and analysis of   |        |              |       |
|     |            |      |  | 225.00 | 0.10         | 22.50 |
|     |            | PMB  | Proposed Intervenor's Motion for Hearing/Oral Argument and Motion to Strike (ECF Nos. 142&143)       | 225.00 | 0.20         | 45.00 |
|     |            | BLR  | Receipt, review and analysis of Plaintiff's response to Russell Greer motions.                       | 225.00 | 0.20         | 45.00 |
| 10  | 0/28/2024  | PMB  | Review and analysis of   |        |              |       |
|     |            |      |  | -      |              |       |
|     |            |      |  |        |              |       |
|     |            |      |  | 225.00 | 0.10         | 22.50 |
|     |            | BLR  | Receipt, review and analysis of Russell Greer reply in support of request for oral argument          | 225.00 | 0.10         | 22.50 |
| 1   | 10/31/2024 | BLR  | Receipt_review and analysis of   | 225.00 | 0.60         | 135.0 |
| 1   | 11/01/2024 | BLR  | Receipt, review and analysis of Plaintiff's detailed motion for reconsideration of order re:         |        |              |       |
|     |            |      |  | 225.00 | 0.30         | 67.5  |
|     | 11/04/2024 | BLR  | Receipt, review and <u>analysis of detailed response to motion to strike</u> filed by Plaintiffs re: | 225.00 | 0 0.20       | 45.0  |
|     |            |      | /  |        |              |       |

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Doe v. Elko County Claim No.: P243-24-08998-02

Brent L. Ryman

Insured: Elko County

| msurec     | i. Lino ( | Sourcy .   |                                   |        |                           |                   |
|------------|-----------|--|-----------------------------------|--------|---------------------------|-------------------|
|            |           |  |                                   | RATE   | HOURS                     |                   |
|            | BLR       | Receipt, review and analysis of proposed intervenor's detailed response to motion for reconsideration, as well as separately-filed motion for judicial notice, | 2                                 | 225.00 | 0.20                      | 45.00             |
| 11/11/2024 | BLR       | Receipt, review and analysis of Plaintiff's motion to strike documents filed by Russell Greer,   | _                                 | 225.00 | 0.10                      | 22.50             |
| 11/12/2024 | РМВ       | Review and analysis of   |                                   | 225.00 |                           | 0.00              |
| 11/14/2024 | РМВ       | Review and analysis of Defendant Chicken Ranch's Opposition to Motion for Reconsideration (ECF No. 148) of Order   |                                   | 225.00 | 0.10                      | 22.50             |
| 11/15/2024 | РМВ       | Review Desert Rose's Motions for Sanctions Pursuant to Rule 11 against plaintiff (.1)(n/c)   |                                   | 225.00 |                           | 0.00              |
|            | BLR       | Receipt, review and analysis of detailed Rule 11 motion for sanctions filed by Defendant Desert Rose Club,   |                                   | 225.00 | 0.20                      | 45.00             |
|            | BLR       | Receipt, review and analysis of Western Best response to motion for reconsideration,   | -                                 | 225.00 | 0.20                      | 45.00             |
| 11/21/2024 | BLR       | Receipt, review and analysis of Plaintiff's combined reply in support of motion for reconsideration,   |                                   | 225.00 | 0.20                      | 45.00             |
|            | BLR       | Receipt, review and analysis of  |                                   | 225.00 | 0.20                      | 45.00             |
| 11/23/2024 | BLR       | Preparation of detailed email report re:   |                                   | 225.00 | 0.30                      | 67.50             |
| 11/27/2024 | BLR       | Receipt, review and analysis of Plaintiff's detailed opposition/reply to Rule 11 motion filed by Desert Rose club, For Current Services Rendered:              |                                   | 225.00 | 0.20                      | 45.00<br>3,971.25 |
|            | В         | Recapitulation Hours   | <u>Rate</u><br>\$112.50<br>225.00 | \$     | TOTAL<br>258.75<br>462.50 |                   |

Page: 7 Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 **Jasmine Sanchez** Page 129 of December 07, 2024 974688 Statement No: Doe v. Elko County Claim No.: P243-24-08998-02 Insured: Elko County **TOTAL** Rate **Hours** Timekeeper 2,250.00 225.00 10.00 Paul M. Bertone Expenses 119.99 Travel expense - Southwest Airlines 10/02/2024 2.69

| 10/02/202  | A-4.5400 (March 2004)                         | 1.54            |
|------------|---|-----------------|
| 10/02/2024 | Travel expense - parking                      | 12.00           |
| 10/02/2024 | Travel expense - Reno Tahoe Airport (parking) | 41.38           |
| 10/02/2024 | Travel expense - Hertz Car Rental             |                 |
| 10/02/2021 |   | 177. <b>4</b> 0 |
|            | Total Expenses                                |                 |
|            |   | 4,148.65        |
|            |   | 4, 140.00       |

Total Current Work 4,148.65

1.34

Total Previous Billings \$9,967.50

**Payments** 

| 10/28/2024 | Payment - Nevada POOL | è | -3,465.00 |
|------------|-----------------------|---|-----------|
| 10/28/2024 | Payment - Nevada POOL |   | -6,502.50 |
| 10/20/2024 | Taylielle Horada Con  |   | -9,967.50 |

Total Payments

Travel expense - fuel

10/02/2024

Balance Due \$4,148.65

Please Remit \$4,148.65

# **ERICKSON, THORPE&** SWAINSTON, LTD.

MAILING ADDRESS: P. O. Box 3559 Reno, Nevada 89505

ATTORNEYS AT LAW

telephone: 775.786.3930 facsimile: 775.786.4160

Tax ID#: 88-0132965

### **INVOICE 01-31-25-BLR**

Statement Date: Statement No.

01/31/2025 974712

25.47850 Account No.

Jasmine Sanchez

639 Isbell, Suite 390 Reno, NV 89509

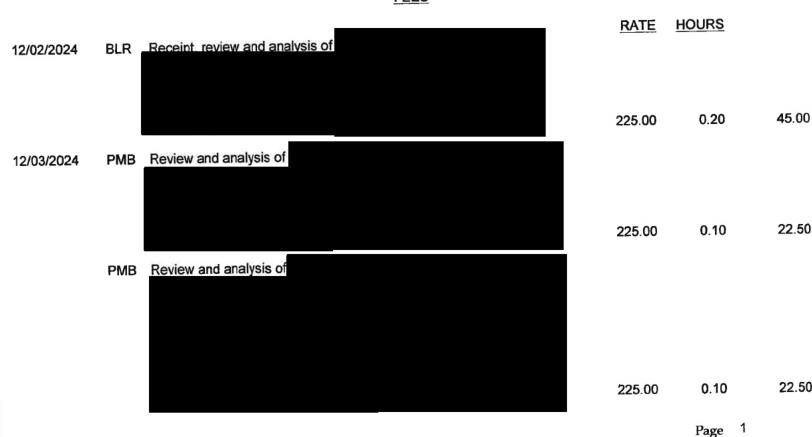
Davies-Group

Doe v. Elko County Claim No.: P243-24-08998-02

Insured: Elko County

For all legal services rendered and costs advanced regarding the above-referenced matter.

# **FEES**



Case 3:24-cv-00065-MMD-CSD Document 160-1 Filed 02/28/25 Jasmine Sanchez Page 131 of 131 anuary 31, 2025 Statement No: 974712 Doe v. Elko County Claim No.: P243-24-08998-02 Insured: Elko County **HOURS** RATE Receipt, review and analysis of Desert Rose Club's reply in support 12/04/2024 BLR 22.50 0.10 225.00 of motion for sanctions Receipt, review and analysis of email from proposed intervenor 12/06/2024 BLR Russell Greer to all counsel re: affidavit, enclosing same, 45.00 0.20 225.00 Receipt, review and analysis of affidavit of filed Russell Greer, BLR 12/09/2024 225.00 0.10 22.50 consideration of relevance Conduct research on 12/17/2024 **PMB** 0.30 67.50 225.00 Review and analysis of 01/16/2025 BLR 22.50 0.10 225.00 BLR Receipt, review 01/23/2025 22.50 225.00 0.10 1.30 292.50 For Current Services Rendered: Recapitulation TOTAL Rate Timekeeper <u>Hours</u> \$180.00 0.80 \$225.00 Brent L. Ryman 225.00 112.50 0.50 Paul M. Bertone 292.50 **Total Current Work** \$4,148.65 **Total Previous Billings** 

**Balance Due** 

Please Remit

Page: 2

\$4,441.15

\$4,441.15